



**VIA ELECTRONIC FILING**

July 26, 2024

Ms. Lisa Felice, Executive Secretary  
Michigan Public Service Commission  
7109 W. Saginaw Highway  
Lansing, MI 48917

**Re: Case No. U-21534**

Dear Executive Secretary Felice:

Attached for electronic filing please find the Direct Testimony of Jigar J. Shah and Rhiannon Davis on behalf of Electrify America LLC. Proof of service is likewise attached to this filing.

Please contact the undersigned if you have any questions or concerns regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read 'SMB', positioned above a horizontal line.

Stephen Bright, Esq.  
Electrify America, LLC  
1950 Opportunity Way, Suite 1500  
Reston, Virginia 20190  
Phone: (781) 206-7979  
Steve.Bright@electrifyamerica.com

cc: Service List, Case No. U-21534

**STATE OF MICHIGAN**

**BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

In the matter of the Application of **DTE** :  
**ELECTRIC COMPANY** for authority to : Case No. U-21534  
increase its rates, amend its rate schedules and :  
rules governing the distribution and supply of : ALJ Sally Wallace  
electric energy, and for miscellaneous :  
accounting authority. :

**DIRECT TESTIMONY OF**

**RHIANNON DAVIS**

**ON BEHALF OF**

**ELECTRIFY AMERICA, LLC**

**July 26, 2024**

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**DIRECT TESTIMONY  
OF  
RHIANNON DAVIS**

**I. QUALIFICATIONS AND DIRECT TESTIMONY OF RHIANNON DAVIS**

**Q. Please state your name, business address, and by whom you are employed.**

A. My name is Rhiannon Davis. My business address is 1500 Opportunity Way, Suite 1500, Reston, Virginia 20190. I am employed by Electrify America, LLC (“Electrify America”) as the Director of Government Affairs.

**Q. On whose behalf are you testifying?**

A. I am testifying on behalf of Electrify America. To date, Electrify America has built a coast-to-coast network of Direct Current (“DC”) Fast Charging (“DCFC”) stations across over 900 locations and with over 4,000 individual DC fast chargers in total, including 9 locations with 42 individual DC fast chargers in Michigan. Within DTE Electric Company’s (“DTE”) service territory, Electrify America currently operates 3 stations with 14 individual DC fast chargers, with more in development. The chargers range from 150 kW to 360 kW of power based on anticipated needs and use cases, as well as available real estate and power. The ultra-fast 360 kW chargers are among the most powerful public chargers on the market today, capable of recharging speeds close to gasoline fueling.

**Q. Please state your educational background and professional experience.**

A. I attended Barnard College of Columbia University and earned a B.A. in Economics. I also attended Georgetown University, where I earned an M.S. in Foreign Service, with a

1 concentration in Global Commerce & Finance. Prior to Electrify America, I worked at  
2 San Diego Gas & Electric for six years, where I was a Policy Manager for the utility’s  
3 clean transportation program and its state government affairs office. I worked with  
4 government representatives, coordinated with industry stakeholders, and advised senior  
5 SDG&E leadership on state policy regarding a range of utility issues, including  
6 transportation electrification (“TE”), distribution system planning, energy storage,  
7 renewable energy generation, and energy efficiency. Prior to that, I served at the U.S.  
8 Department of Energy for nine years, where I held roles of increasing responsibility in the  
9 Office of International Affairs, including Director (Acting) of American Affairs. I led  
10 policy development for DOE’s engagement in the Western Hemisphere and worked with  
11 companies, foreign governments, and other federal agencies to advance U.S. energy and  
12 climate policy in the region. In my current role as Director of Government Affairs, I lead  
13 Electrify America’s advocacy efforts across local, state and federal governments,  
14 including on legislative, regulatory, and utility policy.

15  
16 **Q. What is the purpose of your testimony?**

17 A. The purpose of my testimony is to provide Electrify America’s perspective on DTE’s  
18 proposed programs supporting public DCFC charging, and to suggest specific  
19 modifications that can better support DCFC deployment in DTE’s service territory.<sup>1</sup>

20  
21 **Q. Please introduce the witnesses providing testimony on behalf of Electrify America in**  
22 **this proceeding.**

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<sup>1</sup> See Case No. U-21534, Direct Testimony of Pina Bennett at PB-45, line 24 through PB-47, line 17.

1 A. In addition to myself, Jigar Shah is providing testimony on behalf of Electrify America in  
2 this proceeding. Mr. Shah’s testimony will focus specifically on the proposed EV Fast  
3 Charger Rate<sup>2</sup>, as well as the company’s proposed modifications to its calculation of its  
4 Contribution in Aid of Construction.<sup>3</sup>

5  
6 **Q. Are you sponsoring any exhibits in this case?**

7 A. No, I am not.

8

9 **II. DTE’s PROPOSED PUBLIC CHARGING PROGRAMS**

10 **Q. Can you provide an overview of DTE’s proposed Transportation Electrification**  
11 **Plan (“TEP”) rebate programs related to public charging?**

12 A. Yes. As discussed by DTE Witness Bennett, the Michigan Public Service Commission  
13 (“Commission”) requested DTE to develop a permanent TEP that built upon its previous  
14 Charging Forward program, which was aimed at supporting various sectors of  
15 transportation electrification within its service territory.<sup>4</sup> DTE’s proposed TEP includes  
16 two separate rebate programs aimed at supporting the deployment of public charging: (1)  
17 a rebate of \$70,000 per on-route DCFC installed on-route public fast charging in  
18 disadvantaged communities (“DACs”) and rural areas, and (2) a \$50,000 rebate per on-  
19 route DCFC deployed in other areas<sup>5</sup>.

20

21 **Q. What are the participation criteria an applicant must meet to receive these rebates?**

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<sup>2</sup> See Case No. U-21534, Direct Testimony of Aaron Willis at AW- 34, line 15 through AW- 36, line 17.

<sup>3</sup> *Id.* at AW-45, line 22 through AW-46, line 2.

<sup>4</sup> Direct Testimony of Pina Bennett at PB-13, line 21 through PB-14, line 6.

<sup>5</sup> Direct Testimony of Pina Bennett at PB-46, lines 7-9.

1 A. First, DTE defines on-route DCFCs as those that are “within one mile of a major  
2 throughway exit,”<sup>6</sup> with major throughway defined as “a high-traffic road that is likely to  
3 be a limited access Interstate or State highway.”<sup>7</sup> Second, participating customers must  
4 “install a qualified, networked charger (similar to the Business Charger Rebate program  
5 today), authorize the network provider to share charger data with DTE Electric, and  
6 commit to 97% charger uptime.”<sup>8</sup> Customers seeking to qualify for the DAC on-route  
7 rebate must demonstrate that the DCFC is being sited in a community identified as  
8 disadvantaged by the Michigan State Plan for EV Infrastructure Deployment.<sup>9</sup>  
9 Customers seeking to qualify for the rural on-route rebate must demonstrate that the  
10 DCFC is being sited in a community identified as rural on the U.S. Department of  
11 Transportation Rural Eligibility Map.<sup>10</sup>

12  
13 **Q. What is your perspective on these participation requirements?**

14 A. Most of these requirements are aligned with DTE’s overall goal of supporting the  
15 development of DCFC within its service territory.<sup>11</sup> However, Electrify America is  
16 strongly opposed to the 97% uptime requirement associated with DTE’s proposed on-  
17 route DCFC rebates. The primary reason for Electrify America’s opposition is a  
18 competitive consideration. As stated above, DTE requires recipients of its on-route  
19 DCFC rebates to commit to sharing such data with DTE, and DTE intends to track

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<sup>6</sup> Direct Testimony of Pina Bennett at PB-46, lines 4-5.

<sup>7</sup> Case No. U-21534, DTE’s Response to EVgoDE-1.5.

<sup>8</sup> Direct Testimony of Pina Bennett at PB-47, lines 11-12.

<sup>9</sup> Direct Testimony of Pina Bennett at PB-47, lines 14-15 *citing* Michigan State Plan for EV Infrastructure Deployment available at <https://www.michigan.gov/mdot/travel/mobility/initiatives/nevi>, accessed December 18, 2023.

<sup>10</sup> Direct Testimony of Pina Bennett at PB-47, lines 16-17.

<sup>11</sup> *See generally* Direct Testimony of Pina Bennett at PB-46, lines 1-25.

1 charger uptime to “guide necessary adjustments to program parameters” and the “overall  
2 effectiveness of the TEP.”<sup>12</sup> While Electrify America understands that DTE is seeking to  
3 ensure ratepayer investments in public DCFC are justified, DTE Witness Bennett notes  
4 that DTE “believes that there is merit in the utility owning and operating...chargers,” but  
5 “opted not to include any utility-owned charging with its *initial* TEP” (emphasis  
6 added).<sup>13</sup>

7  
8 Uptime data is confidential and competitively sensitive information. If the Commission  
9 allows for utility-owned investments in the future, DTE will become a direct to  
10 competitor to Electrify America and other operators of DCFC sites within its service  
11 territory. However, unlike Electrify America and its competitors, DTE will be in  
12 possession of years of confidential and competitively sensitive uptime data from every  
13 customer that seeks an on-route DCFC rebate, thereby giving DTE a significant  
14 competitive advantage if it is provided the authority to develop and own DCFC sites in  
15 the future. Therefore, Electrify America strongly opposes a requirement that it provide  
16 confidential and competitively sensitive uptime data to a potential future competitor as a  
17 condition of receiving on-route DCFC rebates.

18  
19 Secondly, as a practical consideration – there are a variety of factors out of a DCFC  
20 site operator’s control that may impact uptime, such as force majeure and extreme  
21 weather, charging cord vandalism, or power outages. Moreover, DTE’s testimony does  
22 not clarify what metrics it is seeking rebate recipients to use to calculate uptime. There

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<sup>12</sup> Direct Testimony of Pina Bennett at PB-52, lines 3-17.

<sup>13</sup> Direct Testimony of Pina Bennett at PB-35, lines 8-13.

1 are a variety of standards and methods to calculate uptime, some of which require many  
2 more manual calculations, tracking, sorting, and administrative oversight than others. To  
3 put it simply – calculating and providing uptime data to DTE would be a much more  
4 onerous and time-consuming process than is currently contemplated in DTE’s testimony.  
5

6 **Q. Do you have any other concerns with DTE’s proposed public charging offerings?**

7 A. Yes. DTE has proposed to not provide rebates for “destination charging” site hosts  
8 installing a DCFC, noting that the economics for these site hosts may not be as  
9 challenging.<sup>14</sup> DTE defines destination chargers as those that “are located at businesses  
10 like hotels, restaurants, or grocery stores, that may not be located within one mile of a  
11 major throughway.”<sup>15</sup> DTE supports the exclusion of providing rebates for such sites,  
12 stating that “these businesses have other incentives and motivations for charger  
13 installation, like increasing foot traffic and attracting customers to their businesses.”<sup>16</sup>  
14

15 Electrify America disagrees with DTE’s proposal to make destination charging sites  
16 ineligible for rebates. As DTE Witness Bennett states, “[s]takeholders ranked all the  
17 public charging subsegments, including on-route and destination charging, the most  
18 important for utility action because the availability of public charging is critical to  
19 reducing range anxiety, which is a key barrier to EV adoption.”<sup>17</sup> However, DTE,  
20 without providing analysis or feedback for its determination that such sites have other  
21 “incentives and inherent benefits,” has declared such sites ineligible for rebates. Electrify

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<sup>14</sup> *Id.* at PB-47, lines 1-7.

<sup>15</sup> Case No. U-21534, DTE’s Response to EVgoDE-1.12.

<sup>16</sup> *Id.*

<sup>17</sup> Direct Testimony of Pina Bennett at PB-46, lines 1-4.

1 America, like other companies that operate DCFC sites, frequently partners with existing  
2 businesses to deploy DCFCs at pre-existing locations of that business. These  
3 partnerships are beneficial to both parties, as the relationship de-risks the economics of  
4 operating such sites and can lead to more rapid and cost-effective deployment of DCFCs  
5 generally. Additionally, by designing the public charging rebates in the way they have,  
6 DTE is artificially limiting the number available sites at which the public charging rebate  
7 criteria can be met. This would be a detriment to DTE’s stated goals of increasing  
8 customer confidence in charging infrastructure<sup>18</sup>, as well as Michigan’s overall goal of  
9 building the infrastructure necessary to support two million electric vehicles by 2030.<sup>19</sup>  
10 Therefore, Electrify America recommends that DTE allow destination charging sites  
11 deploying DCFCs to be eligible for the same rebates as other on-route charging sites.

12  
13 **III. SUMMARY OF ELECTRIFY AMERICA’S RECOMMENDATIONS**  
14 **REGARDING DTE’S PROPOSED PUBLIC CHARGING PROGRAMS**

15 **Q. Can you please restate your recommendations with respect to DTE’s proposed**  
16 **public charging programs?**

17 A. Yes. My recommendations are as follows:

- 18 • Remove the requirement that recipients of on-route DCFC rebates must commit to  
19 97% uptime of their stations and share confidential and competitively sensitive  
20 uptime information with DTE; and

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<sup>18</sup> *Id.* at PB-46, lines 5-6.

<sup>19</sup> Michigan Department of Environment, Great Lakes, and Energy, *MI Healthy Climate Plan* at 37, April 2022 (available at: <https://www.michigan.gov/egle/-/media/Project/Websites/egle/Documents/Offices/OCE/MI-Healthy-Climate-Plan.pdf?rev=d13f4adc2b1d45909bd708cafcebffa>).

- 1           • Allow destination charging sites deploying DCFCs to be eligible for the same  
2 rebates as other on-route charging sites.

3

4 **Q. Does that conclude your testimony?**

5 A. Yes, it does.

**STATE OF MICHIGAN**

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**ELECTRIC COMPANY** for authority to : Case No. U-21534  
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**DIRECT TESTIMONY OF**

**JIGAR J. SHAH**

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**DIRECT TESTIMONY  
OF  
JIGAR J. SHAH**

**I. QUALIFICATIONS AND DIRECT TESTIMONY OF JIGAR J. SHAH**

**Q. Please state your name, business address, and by whom you are employed.**

A. My name is Jigar J. Shah. My business address is 1500 Opportunity Way, Suite 1500, Reston, Virginia 20190. I am employed by Electrify America, LLC (“Electrify America”) as the Director of Energy Services.

**Q. On whose behalf are you testifying?**

A. I am testifying on behalf of Electrify America.

**Q. Please state your educational background and professional experience.**

A. As the Director of Energy Services, I am responsible for optimizing Electrify America’s energy portfolio. I have a Bachelor of Science degree in Electrical and Computer Engineering, with a minor in Business, from Cornell University, and a Master of Engineering degree in Electrical Engineering from Princeton University. Prior to my role at Electrify America, I was a Principal Consultant at West Monroe Partners, advising utility clients on smart grid modernization topics, rate structures, and energy storage. Previously, I was a Senior Researcher at Envision Energy focused on wind farm (plant level) controls and analytics, and an Edison Engineer at General Electric Global Research focused on wind turbine control systems and distributed energy resource controls, including for electric vehicle fleet charging to minimize demand charge costs. I have

1 journal publications and issued patents in the fields of electric vehicle charging, vehicle-  
2 grid integration, and renewable energy.

3  
4 **Q. What is the purpose of your testimony?**

5 A. The purpose of my testimony is to provide Electrify America’s perspective on DTE’s  
6 proposed EV Fast Charger Rate<sup>20</sup>, as well as the company’s proposed modifications to  
7 its calculation of its Contribution in Aid of Construction.<sup>21</sup> I will also provide  
8 recommendations regarding DTE’s existing General Service D3 rate, the expiration of  
9 the rate, and the one megawatt (“MW”) limitation for those taking service on the rate.<sup>22</sup>

10  
11 **Q. Are you sponsoring any exhibits in this case?**

12 A. No, I am not.

13  
14 **II. DTE’S PROPOSED EV FAST CHARGER RATE**

15 **Q. Please describe DTE’s proposed EV Fast Charger Rate.**

16 A. DTE’s proposed electric vehicle (“EV”) Fast Charger Rate is “designed as a secondary  
17 voltage rate with time of use power supply pricing which varies by time period and  
18 season.”<sup>23</sup> To develop the determinants and rate design for the EV Fast Charger Rate,  
19 DTE used historical data from 21 chargers taking service from the company.<sup>24</sup> As

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<sup>20</sup> See Case No. U-21534, Direct Testimony of Aaron Willis at AW- 34, line 15 through AW- 36, line 17.

<sup>21</sup> *Id.* at AW-45, line 22 through AW-46, line 2.

<sup>22</sup> General Service Rate D3 as described in DTE Electric Company Rate Book for Electric Service, available at <https://www.michigan.gov/mpsc/-/media/Project/Websites/mpsc/consumer/rate-books/electric/dte/dteelcur.pdf?rev=e0168ab41b8245bba5f3ca7631c29614&hash=D16249E421EC5AB0F5C3A2304B0FB0F7>, accessed July 23, 2024; See also Direct Testimony of Pina Bennett at PB-55, FN 48.

<sup>23</sup> Direct Testimony of Aaron Willis at AW- 34, lines 17-18.

<sup>24</sup> *Id.* at AW-35, lines 12-19.

1 acknowledged by DTE Witness Willis, the sample size on which the rate was developed  
2 is small and does not include all EV fast chargers served by DTE.<sup>25</sup> Moreover,  
3 developing a rate on such a small cost of service class could “lead to volatile  
4 determinants, [cost of service], and rate design from case to case and individual  
5 customers may have an outsized impact on the overall class.”<sup>26</sup> Ultimately, DTE states  
6 that the EV Fast Charger Rate should not be implemented at the conclusion of this case,  
7 nor did it propose a corresponding tariff be approved.<sup>27</sup>

8  
9 **Q. What is Electrify America’s perspective on the proposed EV Fast Charger Rate?**

10 A. As an initial matter, Electrify America is supportive of the development of a beneficial  
11 rate to support EV adoption in DTE’s service territory. However, Electrify America  
12 shares DTE Witness Willis’ concerns about the sample size and quality from which the  
13 EV Fast Charger Rate was developed<sup>28</sup>, and agrees with DTE that the EV Fast Charger  
14 Rate based on a separate rate class should not be approved as proposed at the conclusion  
15 of this case. As DTE notes in its testimony, it was directed by the Michigan Public  
16 Service Commission (“Commission”) to “conduct a separate [cost of service study] to  
17 allocate appropriate costs to fast charging and design and propose rates for this specific  
18 class of customer in its next rate case.”<sup>29</sup> While DTE has met the Commission’s directive  
19 from Case No. U-21297, it is apparent that the proposed EV Fast Charger Rate based on a  
20 separate rate class is flawed and should not be approved by the Commission. Therefore,

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<sup>25</sup> *Id.* at AW-36, lines 1-10.

<sup>26</sup> *Id.*

<sup>27</sup> Case No. U-21534, DTE Response to EADE-1.3a.

<sup>28</sup> Direct Testimony of Aaron Willis at AW-35, lines 22-23.

<sup>29</sup> Case No. U-21297, *In the matter of the application of DTE Electric Company for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority*, Order at 342 (December 1, 2023).

1 Electrify America agrees with DTE and recommends that the Commission decline to  
2 implement the proposed EV Fast Charger Rate or the creation of a separate rate class for  
3 DCFC at the conclusion of this proceeding.

4  
5 **Q. Does Electrify America have any recommendations for the Commission on rates for**  
6 **DCFC customers?**

7 A. Yes. Currently, DTE offers its General Service Rate D3 for DCFC site hosts.<sup>30</sup> This rate  
8 does not have demand charges, but eligibility for the D3 rate is restricted to DCFC sites  
9 that are less than one megawatt.<sup>31</sup> As DTE notes in its tariff, “service may be available to  
10 loads in excess of 1000 kW for situations where significant modifications to service  
11 facilities are not required to serve the excess load,” but, “the 1000 kW discretionary  
12 demand restriction does not apply to service provided to Electric Vehicle Fast-Charging  
13 Stations until June 1, 2026 for existing stations and for two years after beginning service  
14 for new stations.”<sup>32</sup> As the Commission succinctly put it in Case No. U-21297, the  
15 demand charge relief for DCFC sites greater than 1 MW that take service under the D3  
16 rate can only be relied on until June 2026.<sup>33</sup> While DTE contends that the vast majority  
17 of DCFC installations will remain below the 1 MW threshold and indicates it will revisit  
18 the D3 rate structure if necessary after June 2026<sup>34</sup>, this provides little comfort to current  
19 DCFC sites greater than 1 MW. Given the timelines associated with DCFC site  
20 development and investment justification, which are often over a 10-year or longer

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<sup>30</sup> Direct Testimony of Pina Bennett at PB-47, lines 4-6.

<sup>31</sup> Direct Testimony of Pina Bennett at PB-47, lines 4-6 *citing* DTE Electric Company, M.P.S.C. No. 1- Electric, Tenth Revised Sheet No. D-18.00.

<sup>32</sup> DTE Electric Company, M.P.S.C. No. 1- Electric, Tenth Revised Sheet No. D-18.00.

<sup>33</sup> Case No. U-21297, Order at 338.

<sup>34</sup> Direct Testimony of Pina Bennett at PB-55, FN 48.

1 period, two years of guaranteed demand charge relief is not a long enough period to  
2 provide enough cost certainty to Electrify America when it is making investment  
3 decisions in DTE’s service territory. DTE should therefore modify its tariff language to  
4 allow DCFC sites built before a specified date, preferably by 2028 or later, to be able to  
5 take service under the D3 rate.

6  
7 **III. DTE’S PROPOSED ELIMINATION OF ITS CONTRIBUTION IN AID OF**  
8 **CONSTRUCTION (“CIAC”) WAIVERS FOR CHARGING FORWARD**  
9 **CUSTOMERS**

10 **Q. Does DTE propose to make any rate book modifications as part of its transportation**  
11 **electrification plan (“TEP”)?**

12 A. Yes. DTE proposes to delete the Charging Forward CIAC waiver in section C6.1(16)  
13 of Section C – Part I, Company Rules and Regulations.<sup>35</sup> DTE Witness Bennett states  
14 that as part of its TEP, DTE decided to no longer waive CIAC beyond revenue credits  
15 from the existing line extension policy in an effort to provide “positive rate impacts and  
16 affordability benefits accruing to all customers.”<sup>36</sup> DTE estimates that continuing with  
17 its current CIAC waiver would result in “15% of the total capital required for customer  
18 connections, based on historical data, needing to be funded through electric rates by other  
19 customers.”<sup>37</sup> The transition from a pilot to a permanent TEP, from DTE’s perspective,  
20 necessitates that it align the CIAC policy for EV customers with that of all other  
21 customer connections.<sup>38</sup>

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<sup>35</sup> Direct Testimony of Pina Bennett at PB-51, lines 1-4.

<sup>36</sup> *Id.* at lines 8-12.

<sup>37</sup> Case No. U-21534, DTE Response to EVgoDE-1.7.

<sup>38</sup> *Id.*

1 **Q. Does Electrify America agree with DTE’s proposed modification to its CIAC waiver**  
2 **policy?**

3 A. No. As described above in the context of rates, cost certainty is imperative for Electrify  
4 America as it determines where it sites future DCFC locations. Part of Electrify  
5 America’s costs as it develops DCFC sites are the line extension costs imposed by  
6 utilities, and as DTE acknowledges, the capital costs associated with the development of  
7 DCFC sites can be significant.<sup>39</sup> Furthermore, the magnitude of such costs are not often  
8 known until very late in the process after significant development work has been  
9 committed, increasing project risk. Removing the CIAC waiver undercuts DTE’s goals  
10 of expanding public charging infrastructure and reducing range anxiety because it  
11 increases the already significant costs of DCFC site development and will likely serve to  
12 restrict future DCFC site development within its service territory. Furthermore, Electrify  
13 America notes that DTE’s positioning to potentially own and operate DCFC with  
14 ratepayer funds in a future TEP<sup>40</sup>, in conjunction with its proposed removal of the CIAC  
15 waiver from its rate book<sup>41</sup>, may lead to reduced deployment in DTE’s service area. In  
16 turn, this would increase the potential for broader utility-owned and operated  
17 infrastructure to fill in the deployment gap, albeit at increased costs to ratepayers when  
18 compared to costs of maintaining the CIAC waiver. The Commission should note the  
19 competitive implications presented by DTE’s proposed removal of the CIAC waiver for  
20 EV customers, and maintain the CIAC waiver to reduce the long-term ratepayer  
21 contributions required to meet the state’s transportation electrification goals.

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<sup>39</sup> Direct Testimony of Pina Bennett at PB-29, lines 8-11.

<sup>40</sup> Direct Testimony of Pina Bennett at PB-35, lines 8-13.

<sup>41</sup> Direct Testimony of Pina Bennett at PB-51, lines 8-12.

1 **IV. SUMMARY OF RECOMMENDATIONS**

2 **Q. Please restate the recommendations put forth in your testimony.**

3 A. My recommendations are as follows:

4 • The Commission should agree with DTE and decline to implement the EV Fast Charger  
5 Rate at the conclusion of this proceeding;

6 • The Commission should modify the tariff language for the D3 rate and allow DCFC sites  
7 built before 2028 or later to be able to take service under the D3 rate.

8 • The Commission should reject DTE’s proposal to remove its CIAC waiver for EV  
9 customers.

10

11 **Q. Does this conclude your testimony?**

12 A. Yes, it does.

**STATE OF MICHIGAN**

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**PROOF OF SERVICE**

On July 26, 2024, an electronic copy of the direct testimony of Rhiannon Davis and Jigar J. Shah on behalf of Electrify America LLC was served on the following via email. I hereby verify that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Sincerely,



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Stephen Bright, Esq.  
Electrify America, LLC  
1950 Opportunity Way, Suite 1500  
Reston, Virginia 20190  
Phone: (781) 206-7979  
Steve.Bright@electrifyamerica.com

**MPSC Case No. U-21534**

**Service List**

**Page 1**

**ABATE**

Michael J. Pattwell  
Clark Hill PLC  
212 E. Cesar E. Chavez Avenue  
Lansing, MI 48906  
[mpattwell@clarkhill.com](mailto:mpattwell@clarkhill.com)

Stephen A. Campbell  
Clark Hill PLC  
500 Woodward Avenue, Suite 3500  
Detroit, MI 48226  
[scampbell@clarkhill.com](mailto:scampbell@clarkhill.com)

**ABATE Consultant**

Brian C. Andrews  
James R. Dauphinais  
Christopher C. Walters  
Jessica York  
[bandrews@consultbai.com](mailto:bandrews@consultbai.com)  
[jdauphinais@consultbai.com](mailto:jdauphinais@consultbai.com)  
[cwalters@consultbai.com](mailto:cwalters@consultbai.com)  
[jyork@consultbai.com](mailto:jyork@consultbai.com)

**ADVANCED ENERGY UNITED; ENERGY MICHIGAN, INC.; FOUNDRY ASSOCIATION OF MICHIGAN; INSTITUTE FOR ENERGY INNOVATION; MICHIGAN ENERGY INNOVATION BUSINESS COUNCIL**

Laura A. Chappelle  
Timothy J. Lundgren  
Justin K. Ooms  
Potomac Law Group PLLC  
120 N. Washington Square, Suite 300  
Lansing, MI 48933  
[lchappelle@potomaclaw.com](mailto:lchappelle@potomaclaw.com)  
[tlundgren@potomaclaw.com](mailto:tlundgren@potomaclaw.com)  
[jooms@potomaclaw.com](mailto:jooms@potomaclaw.com)

Justin Barnes  
Alexander J. Zakem  
[jbarnes@eq-research.com](mailto:jbarnes@eq-research.com)  
[ajz-consulting@comcast.net](mailto:ajz-consulting@comcast.net)

**MICHIGAN EIBC/IEI/UNITED**

Laura Sherman  
[laura@mieibc.org](mailto:laura@mieibc.org)

**CITIZENS UTILITY BOARD OF MICHIGAN; MICHIGAN ENVIRONMENTAL COUNCIL; NATURAL RESOURCES DEFENSE COUNCIL; SIERRA CLUB**

Christopher M. Bzdok  
Tracy Jane Andrews  
Troposphere Legal  
420 East Front Street  
Traverse City, MI 49686  
[chris@tropospherelegal.com](mailto:chris@tropospherelegal.com)  
[tjandrews@tropospherelegal.com](mailto:tjandrews@tropospherelegal.com)

Breanna Thomas, Legal Assistant  
[breanna@tropospherelegal.com](mailto:breanna@tropospherelegal.com)

**Consultants:**

Josh Denzler  
Julielyn Gibbons  
David Gard  
Douglas Jester  
Matt Bandyk  
Paul Alvarez  
Dennis Stephens  
[jdenzler@5lakesenergy.com](mailto:jdenzler@5lakesenergy.com)  
[jgibbons@5lakesenergy.com](mailto:jgibbons@5lakesenergy.com)  
[dgard@5lakesenergy.com](mailto:dgard@5lakesenergy.com)  
[djester@5lakesenergy.com](mailto:djester@5lakesenergy.com)  
[mbandyk@5lakesenergy.com](mailto:mbandyk@5lakesenergy.com)  
[palvarez@wiredgroup.net](mailto:palvarez@wiredgroup.net)  
[dennis.stephens@hotmail.com](mailto:dennis.stephens@hotmail.com)

**CITY OF ANN ARBOR**

Valerie J.M. Brader  
Rivenoak Law Group P.C.  
3331 W. Big Beaver Rd., Suite 109  
Troy, MI 48084  
[valerie@rivenoaklaw.com](mailto:valerie@rivenoaklaw.com)  
[ecf@rivenoaklaw.com](mailto:ecf@rivenoaklaw.com)

Valerie Jackson  
Assistant City Attorney  
City of Ann Arbor  
Guy C. Larcom City Hall  
301. E. Huron Street  
Ann Arbor, MI 48104  
[Vjackson@a2gov.org](mailto:Vjackson@a2gov.org)

**City of Ann Arbor Consultant:**

Richard J. Bunch  
[rick@mi-maui.org](mailto:rick@mi-maui.org)

**DTE ENERGY COMPANY**

Jon P. Christinidis  
Andrea E. Hayden  
Paula Johnson-Bacon  
John Janiszewski  
Breanne K. Reitzel  
DTE Electric Company  
One Energy Plaza, 1635WCB  
Detroit, Michigan 48226  
[mpscfilings@dteenergy.com](mailto:mpscfilings@dteenergy.com)  
[jon.christinidis@dteenergy.com](mailto:jon.christinidis@dteenergy.com)  
[andrea.hayden@dteenergy.com](mailto:andrea.hayden@dteenergy.com)  
[paula.bacon@dteenergy.com](mailto:paula.bacon@dteenergy.com)  
[john.janiszewski@dteenergy.com](mailto:john.janiszewski@dteenergy.com)  
[breanne.reitzel@dteenergy.com](mailto:breanne.reitzel@dteenergy.com)

**ENVIRONMENTAL LAW AND POLICY CENTER; ECOLOGY CENTER; UNION OF CONCERNED SCIENTISTS; VOTE SOLAR**

Daniel Abrams  
Nicholas Wallace  
James Gignac  
Will Kenworthy  
Brad Klein  
Lee Shaver  
Boratha Tan  
Curt Volkman  
Environmental Law & Policy Center  
35 E. Wacker Drive, Suite 1600  
Chicago, IL 60601  
[dabrams@elpc.org](mailto:dabrams@elpc.org)  
[nwallace@elpc.org](mailto:nwallace@elpc.org)  
[jgignac@ucsusa.org](mailto:jgignac@ucsusa.org)  
[will@votesolar.org](mailto:will@votesolar.org)  
[bklein@elpc.org](mailto:bklein@elpc.org)  
[lshaver@ucsusa.org](mailto:lshaver@ucsusa.org)  
[btan@votesolar.org](mailto:btan@votesolar.org)  
[curt@newenergy-advisors.com](mailto:curt@newenergy-advisors.com)

Sydney White, Legal Intern  
Carolyn Boyce, ELPC Paralegal  
Alondra Estrada, ELPC Legal Assistant  
[swhite@elpc.org](mailto:swhite@elpc.org)  
[cboyce@elpc.org](mailto:cboyce@elpc.org)  
[astrada@elpc.org](mailto:astrada@elpc.org)  
[MPSCDocket@elpc.org](mailto:MPSCDocket@elpc.org)

**EVGO SERVICES, LLC**

Nikhil Vijaykar  
Keyes & Fox LLP  
580 California Street, 12th Floor  
San Francisco, CA 94104  
[nvijaykar@keyesfox.com](mailto:nvijaykar@keyesfox.com)

Michael G. Oliva  
Foster Swift Collins & Smith, PC  
313 S. Washington Square  
Lansing, MI 48933-2193  
[moliva@fosterswift.com](mailto:moliva@fosterswift.com)

Alicia Zaloga, Paralegal  
Lindsey Stegall  
[azaloga@keyesfox.com](mailto:azaloga@keyesfox.com)  
[Lindsey.Stegall@evgo.com](mailto:Lindsey.Stegall@evgo.com)

**GREAT LAKES RENEWABLE ENERGY ASSOCIATION INC.**

Don L. Keskey  
Brian W. Coyer  
University Office Place  
333 Albert Avenue, Suite 425  
East Lansing, MI 48823  
[donkeskey@publiclawresourcecenter.com](mailto:donkeskey@publiclawresourcecenter.com)  
[bwcoyer@publiclawresourcecenter.com](mailto:bwcoyer@publiclawresourcecenter.com)

John Freeman  
Bridget Corwin  
John Richter  
[jfreeman13@comcast.net](mailto:jfreeman13@comcast.net)  
[bcorwin@umich.edu](mailto:bcorwin@umich.edu)  
[johnarichter@pm.me](mailto:johnarichter@pm.me)

**INTERNATIONAL TRANSMISSION  
COMPANY**

Richard J. Aaron  
Courtney F. Kissel  
Olivia R.C.A. Flower  
Hannah E. Buzolits  
201 Townsend Street, Suite 900  
Lansing, MI 48933  
[RAaron@dykema.com](mailto:RAaron@dykema.com)  
[CKissel@dykema.com](mailto:CKissel@dykema.com)  
[OFlower@dykema.com](mailto:OFlower@dykema.com)  
[HBuzolits@dykema.com](mailto:HBuzolits@dykema.com)

**THE KROGER COMPANY**

Michael L. Kurtz  
Kurt J. Boehm  
Jody Kyler Cohn  
Boehm, Kurtz & Lowry  
36 East Seventh Street, Suite 1510  
Cincinnati, OH 45202  
[mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)  
[KBoehm@BKLawfirm.com](mailto:KBoehm@BKLawfirm.com)  
[JKylerCohn@BKLawfirm.com](mailto:JKylerCohn@BKLawfirm.com)

**Kroger Consultant**

Justin Bieber  
[jbieber@energystrat.com](mailto:jbieber@energystrat.com)

**MICHIGAN ATTORNEY GENERAL**

Joel King  
Assistant Attorney General  
ENRA Division  
525 W. Ottawa Street, 6th Floor  
P.O. Box 30755  
Lansing, MI 48909  
[KingJ38@michigan.gov](mailto:KingJ38@michigan.gov)  
[ag-enra-spec-lit@michigan.gov](mailto:ag-enra-spec-lit@michigan.gov)

**AG Consultant**

Seb Coppola  
[sebcoppola@corpilytics.com](mailto:sebcoppola@corpilytics.com)

**MICHIGAN CABLE  
TELECOMMUNICATIONS ASSOC.;;  
ZECO SYSTEMS, INC. D/B/A  
GREENLOTS**

Sean P. Gallagher  
Fraser Trebilcock Davis & Dunlap  
124 West Allegan Street, Suite 1000  
Lansing, MI 48933  
[sgallagher@fraserlawfirm.com](mailto:sgallagher@fraserlawfirm.com)

Justin Mann, Legal Assistant  
[jmann@fraserlawfirm.com](mailto:jmann@fraserlawfirm.com)

**MICHIGAN MUNICIPAL  
ASSOCIATION FOR UTILITY ISSUES**

Valerie J.M. Brader  
Rivenoak Law Group P.C.  
3331 W. Big Beaver Rd., Suite 109  
Troy, MI 48084  
[valerie@rivenoaklaw.com](mailto:valerie@rivenoaklaw.com)  
Linda Hofrichter  
Rick Bunch  
[lhd@rivenoaklaw.com](mailto:lhd@rivenoaklaw.com)  
[rick@mi-maui.org](mailto:rick@mi-maui.org)

**MPSC STAFF**

Heather M.S. Durian  
Michael J. Orris  
Amit T. Singh  
Monica M. Stephens  
Public Service Division  
7109 West Saginaw Hwy, 3<sup>rd</sup> Floor  
Lansing, MI 48917  
[durianh@michigan.gov](mailto:durianh@michigan.gov)  
[orrism@michigan.gov](mailto:orrism@michigan.gov)  
[singha9@michigan.gov](mailto:singha9@michigan.gov)  
[stephensm11@michigan.gov](mailto:stephensm11@michigan.gov)

Lori Mayabb  
MPSC Staff Case Coordinator  
[mayabbl@michigan.gov](mailto:mayabbl@michigan.gov)

**SOULARDARITY; WE WANT GREEN, TOO**

Mark Templeton

Amanda Urban

Jacob Schuhardt

Sam Heppell

Boris Lukanov

Joseph Amdur

Claire Black

Michelle David

Jason Frey

Andrew Kieffer

Ellie Maltby

Andrew Obeso

Ivy Truong

Jesse Bernes-Zieve

Josh Bretthauer

Sara Macedo

Serendipity Welsh

Adriel Ghadoushi

University of Chicago Law School

Abrams Environmental Law Clinic

6020 South University Avenue

Chicago, IL 60637

[templeton@uchicago.edu](mailto:templeton@uchicago.edu)

[t-9aurba@lawclinics.uchicago.edu](mailto:t-9aurba@lawclinics.uchicago.edu)

[jschuhardt@uchicago.edu](mailto:jschuhardt@uchicago.edu)

[heppell@uchicago.edu](mailto:heppell@uchicago.edu)

[blukanov@psehealthyenergy.org](mailto:blukanov@psehealthyenergy.org)

[aelc\\_mpsc@lawclinic.uchicago.edu](mailto:aelc_mpsc@lawclinic.uchicago.edu)

Justin Schott

[jbschott@umich.edu](mailto:jbschott@umich.edu)

Madison S. Wilson, Legal Assistant

[madisonswilson@uchicago.edu](mailto:madisonswilson@uchicago.edu)

**UTILITY WORKERS LOCAL 223**

Ben King

3950 W. 11 Mile Road

Berkley, MI 48072

[bking@michworkerlaw.com](mailto:bking@michworkerlaw.com)

**WAL-MART**

Melissa M. Horne

Higgins, Cavanagh & Cooney, LLP

10 Dorrance Street, 4th Floor

Providence, RI 02903

[mhorne@hcc-law.com](mailto:mhorne@hcc-law.com)