



VIA ELECTRONIC FILING

August 13, 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 Revised Direct Testimony of Jigar J. Shah and Rhiannon Davis on behalf of Electrify America LLC. The initial direct testimony filed in this proceeding failed to include the exhibit lists for both Mr. Shah and Ms. Davis, which are now attached. Proof of service is likewise attached to this filing.

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

Sincerely,

A handwritten signature in black ink, appearing to read "SMB", written over a horizontal line.

Stephen Bright, Esq.
Electrify America, LLC
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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. :

REVISED 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.¹

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

¹ 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 Rate², as well as the company’s proposed modifications to its calculation of its
4 Contribution in Aid of Construction.³

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

7 A. ~~No, I am not.~~ Yes. I am sponsoring the following exhibit to my testimony:

- 8 • Exhibit EA-1 (EA-RD-1): Compiled discovery responses.
- 9

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

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

13 A. Yes. As discussed by DTE Witness Bennett, the Michigan Public Service Commission
14 (“Commission”) requested DTE to develop a permanent TEP that built upon its previous
15 Charging Forward program, which was aimed at supporting various sectors of
16 transportation electrification within its service territory.⁴ DTE’s proposed TEP includes
17 two separate rebate programs aimed at supporting the deployment of public charging: (1)
18 a rebate of \$70,000 per on-route DCFC installed on-route public fast charging in
19 disadvantaged communities (“DACs”) and rural areas, and (2) a \$50,000 rebate per on-
20 route DCFC deployed in other areas⁵.

21

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

³ *Id.* at AW-45, line 22 through AW-46, line 2.

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

⁵ Direct Testimony of Pina Bennett at PB-46, lines 7-9.

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

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

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

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

⁶ Direct Testimony of Pina Bennett at PB-46, lines 4-5.

⁷ [See Exhibit EA-1 \(EA-RD-1\)](#), Case No. U-21534, DTE’s Response to EVgoDE-1.5.

⁸ Direct Testimony of Pina Bennett at PB-47, lines 11-12.

⁹ 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.

¹⁰ Direct Testimony of Pina Bennett at PB-47, lines 16-17.

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

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

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

19
20 Secondly, as a practical consideration – there are a variety of factors out of a DCFC
21 site operator’s control that may impact uptime, such as force majeure and extreme
22 weather, charging cord vandalism, or power outages. Moreover, DTE’s testimony does

¹² Direct Testimony of Pina Bennett at PB-52, lines 3-17.

¹³ Direct Testimony of Pina Bennett at PB-35, lines 8-13.

1 not clarify what metrics it is seeking rebate recipients to use to calculate uptime. There
2 are a variety of standards and methods to calculate uptime, some of which require many
3 more manual calculations, tracking, sorting, and administrative oversight than others. To
4 put it simply – calculating and providing uptime data to DTE would be a much more
5 onerous and time-consuming process than is currently contemplated in DTE’s testimony.
6

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

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

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

¹⁴ *Id.* at PB-47, lines 1-7.

¹⁵ [See Exhibit EA-1 \(EA-RD-1\)](#), Case No. U-21534, DTE’s Response to EVgoDE-1.12.

¹⁶ [See Exhibit EA-1 \(EA-RD-1\)](#).~~*Id.*~~

¹⁷ Direct Testimony of Pina Bennett at PB-46, lines 1-4.

1 “incentives and inherent benefits,” has declared such sites ineligible for rebates. Electrify
2 America, like other companies that operate DCFC sites, frequently partners with existing
3 businesses to deploy DCFCs at pre-existing locations of that business. These
4 partnerships are beneficial to both parties, as the relationship de-risks the economics of
5 operating such sites and can lead to more rapid and cost-effective deployment of DCFCs
6 generally. Additionally, by designing the public charging rebates in the way they have,
7 DTE is artificially limiting the number available sites at which the public charging rebate
8 criteria can be met. This would be a detriment to DTE’s stated goals of increasing
9 customer confidence in charging infrastructure¹⁸, as well as Michigan’s overall goal of
10 building the infrastructure necessary to support two million electric vehicles by 2030.¹⁹
11 Therefore, Electrify America recommends that DTE allow destination charging sites
12 deploying DCFCs to be eligible for the same rebates as other on-route charging sites.

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

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

18 A. Yes. My recommendations are as follows:

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

¹⁸ *Id.* at PB-46, lines 5-6.

¹⁹ 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=d13f4adc2b1d45909bd708cafccbffa>).

- 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.

6

STATE OF MICHIGAN

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REVISED DIRECT TESTIMONY OF

JIGAR J. SHAH

ON BEHALF OF

ELECTRIFY AMERICA, LLC

July 26, 2024

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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 Rate²⁰, as well as the company’s proposed modifications to
7 its calculation of its Contribution in Aid of Construction.²¹ 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.²²

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

12 A. ~~No, I am not.~~ Yes, I am sponsoring the following exhibit to my testimony:

- 13 • Exhibit EA-2 (EA-JJS-1): Compiled discovery responses.

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

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

17 A. DTE’s proposed electric vehicle (“EV”) Fast Charger Rate is “designed as a secondary
18 voltage rate with time of use power supply pricing which varies by time period and
19 season.”²³ To develop the determinants and rate design for the EV Fast Charger Rate,

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

²¹ *Id.* at AW-45, line 22 through AW-46, line 2.

²² 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.

²³ Direct Testimony of Aaron Willis at AW- 34, lines 17-18.

1 DTE used historical data from 21 chargers taking service from the company.²⁴ As
2 acknowledged by DTE Witness Willis, the sample size on which the rate was developed
3 is small and does not include all EV fast chargers served by DTE.²⁵ Moreover,
4 developing a rate on such a small cost of service class could “lead to volatile
5 determinants, [cost of service], and rate design from case to case and individual
6 customers may have an outsized impact on the overall class.”²⁶ Ultimately, DTE states
7 that the EV Fast Charger Rate should not be implemented at the conclusion of this case,
8 nor did it propose a corresponding tariff be approved.²⁷

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

11 A. As an initial matter, Electrify America is supportive of the development of a beneficial
12 rate to support EV adoption in DTE’s service territory. However, Electrify America
13 shares DTE Witness Willis’ concerns about the sample size and quality from which the
14 EV Fast Charger Rate was developed²⁸, and agrees with DTE that the EV Fast Charger
15 Rate based on a separate rate class should not be approved as proposed at the conclusion
16 of this case. As DTE notes in its testimony, it was directed by the Michigan Public
17 Service Commission (“Commission”) to “conduct a separate [cost of service study] to
18 allocate appropriate costs to fast charging and design and propose rates for this specific
19 class of customer in its next rate case.”²⁹ While DTE has met the Commission’s directive

²⁴ *Id.* at AW-35, lines 12-19.

²⁵ *Id.* at AW-36, lines 1-10.

²⁶ *Id.*

²⁷ See Exhibit EA-2 (EA-JJS-1), Case No. U-21534, DTE Response to EADE-1.3a.

²⁸ Direct Testimony of Aaron Willis at AW-35, lines 22-23.

²⁹ 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 from Case No. U-21297, it is apparent that the proposed EV Fast Charger Rate based on a
2 separate rate class is flawed and should not be approved by the Commission. Therefore,
3 Electrify America agrees with DTE and recommends that the Commission decline to
4 implement the proposed EV Fast Charger Rate or the creation of a separate rate class for
5 DCFC at the conclusion of this proceeding.

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

9 A. Yes. Currently, DTE offers its General Service Rate D3 for DCFC site hosts.³⁰ This rate
10 does not have demand charges, but eligibility for the D3 rate is restricted to DCFC sites
11 that are less than one megawatt.³¹ As DTE notes in its tariff, “service may be available to
12 loads in excess of 1000 kW for situations where significant modifications to service
13 facilities are not required to serve the excess load,” but, “the 1000 kW discretionary
14 demand restriction does not apply to service provided to Electric Vehicle Fast-Charging
15 Stations until June 1, 2026 for existing stations and for two years after beginning service
16 for new stations.”³² As the Commission succinctly put it in Case No. U-21297, the
17 demand charge relief for DCFC sites greater than 1 MW that take service under the D3
18 rate can only be relied on until June 2026.³³ While DTE contends that the vast majority
19 of DCFC installations will remain below the 1 MW threshold and indicates it will revisit
20 the D3 rate structure if necessary after June 2026³⁴, this provides little comfort to current

³⁰ Direct Testimony of Pina Bennett at PB-47, lines 4-6.

³¹ 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.

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

³³ Case No. U-21297, Order at 338.

³⁴ Direct Testimony of Pina Bennett at PB-55, FN 48.

1 DCFC sites greater than 1 MW. Given the timelines associated with DCFC site
2 development and investment justification, which are often over a 10-year or longer
3 period, two years of guaranteed demand charge relief is not a long enough period to
4 provide enough cost certainty to Electrify America when it is making investment
5 decisions in DTE’s service territory. DTE should therefore modify its tariff language to
6 allow DCFC sites built before a specified date, preferably by 2028 or later, to be able to
7 take service under the D3 rate.

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

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

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

³⁵ Direct Testimony of Pina Bennett at PB-51, lines 1-4.

³⁶ *Id.* at lines 8-12.

³⁷ [See Exhibit EA-2 \(EA-JJS-1\)](#), Case No. U-21534, DTE Response to EVgoDE-1.7.

1 necessitates that it align the CIAC policy for EV customers with that of all other
2 customer connections.³⁸

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

5 A. No. As described above in the context of rates, cost certainty is imperative for Electrify
6 America as it determines where it sites future DCFC locations. Part of Electrify
7 America’s costs as it develops DCFC sites are the line extension costs imposed by
8 utilities, and as DTE acknowledges, the capital costs associated with the development of
9 DCFC sites can be significant.³⁹ Furthermore, the magnitude of such costs are not often
10 known until very late in the process after significant development work has been
11 committed, increasing project risk. Removing the CIAC waiver undercuts DTE’s goals
12 of expanding public charging infrastructure and reducing range anxiety because it
13 increases the already significant costs of DCFC site development and will likely serve to
14 restrict future DCFC site development within its service territory. Furthermore, Electrify
15 America notes that DTE’s positioning to potentially own and operate DCFC with
16 ratepayer funds in a future TEP⁴⁰, in conjunction with its proposed removal of the CIAC
17 waiver from its rate book⁴¹, may lead to reduced deployment in DTE’s service area. In
18 turn, this would increase the potential for broader utility-owned and operated
19 infrastructure to fill in the deployment gap, albeit at increased costs to ratepayers when
20 compared to costs of maintaining the CIAC waiver. The Commission should note the
21 competitive implications presented by DTE’s proposed removal of the CIAC waiver for

³⁸ [See Exhibit EA-2 \(EA-JJS-1\).pdf](#)

³⁹ Direct Testimony of Pina Bennett at PB-29, lines 8-11.

⁴⁰ Direct Testimony of Pina Bennett at PB-35, lines 8-13.

⁴¹ Direct Testimony of Pina Bennett at PB-51, lines 8-12.

1 EV customers, and maintain the CIAC waiver to reduce the long-term ratepayer
2 contributions required to meet the state’s transportation electrification goals.

3 **IV. SUMMARY OF RECOMMENDATIONS**

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

5 A. My recommendations are as follows:

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

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

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

12

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

14 A. Yes, it does.

MPSC Case No: U-21534

Requester: Evgo

Question No.: EVgoDE-1.5

Respondent: P. Bennett

Page: 1 of 1

Question: Company witness Bennett defines “on-route fast charging” as “fast charging within one mile of a major throughway exit.” See direct testimony of witness Bennett at PB-46 lines 4-5. Please define “major throughway” as used in the referenced testimony.

Answer: Major throughway is intended to refer to a high-traffic road that is likely to be a limited access Interstate or State highway.

Attachment: *None*

MPSC Case No: U-21534

Requester: Evgo

Question No.: EVgoDE-1.12

Respondent: P. Bennett

Page: 1 of 1

Question: Refer to the testimony of witness Bennett at PB-47, lines 1-6. Please provide any analysis the Company conducted, or feedback the Company received, that supports the exclusion of rebates for Destination DCFCs in its Transportation Electrification Plan.

Answer: Destination chargers, by definition, are located at businesses like hotels, restaurants, or grocery stores, that may not be located within one mile of a major throughway. In order to balance public charger support with overall customer affordability the Company considered that these businesses have other incentives and motivations for charger installation, like increasing foot traffic and attracting customers to their businesses. Therefore, the Company determined to direct finite incentives to locations with fewer such incentives and inherent benefits.

Attachment: *None*

MPSC Case No: U-21534

Requester: EA

Question No.: EADE-1.3a

Respondent: A. Willis

Page: 1 of 1

Question: Refer to the testimony of DTE Witness Willis at page AW-34, lines 16-20, and AW-35, lines 1-9. Please clarify the following regarding DTE's proposed EV fast charger rate:

a. Will EV fast charger customers (as defined by DTE) be required to take service under the proposed rate?

Answer: No. The Company is not proposing that the rate be implemented in this case and did not propose a corresponding tariff be approved. As such the Company has not made any proposal regarding the applicability or requirements of the rate.

Attachment: None

MPSC Case No: U-21534

Requester: Evgo

Question No.: EVgoDE-1.7

Respondent: P. Bennett

Page: 1 of 1

Question: Please refer to the testimony of witness Bennett, page PB-51, lines 8-12, where the Company states it will no longer waive CIAC beyond revenue credits from its existing line extension policy “[c]onsistent with providing positive rate impacts and affordability benefits accruing to all customers.” Please provide any analysis the Company conducted or consulted underlying its assertion that no longer waiving CIAC beyond revenue credits from its existing line extension policy would “provide rate impacts and affordability benefits accruing to all customers.”

Answer: DTE Electric estimated that waiving CIAC beyond revenue credits from its existing line extension policy would lead to 15% of the total capital required for customer connections, based on historical data, needing to be funded through electric rates by other customers.

As the Company transitions from a pilot to a permanent Transportation Electrification program, the CIAC policy for EV customers should be the same as for all other customer connections.

Attachment: *None*

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electric energy, and for miscellaneous :
accounting authority. :

PROOF OF SERVICE

On August 13, 2024, an electronic copy of the revised 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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