



Via Electronic Case Filing

August 16, 2024

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

RE: Case No. U-21534

Dear Executive Secretary Felice:

Please find attached the following for paperless filing in the above captioned matter.

Rebuttal Testimony of Lindsey Stegall on behalf of EVgo Services, LLC
EVgo Exhibit List
Exhibit EVG-3 (LRS-3)
Proof of Service

Thank you for your consideration.

Sincerely,

/s/ Nikhil Vijaykar
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CC: Parties to 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)
increase its rates, amend its rate schedules)
and rules governing the distribution and)
supply of electric energy, and for)
miscellaneous accounting authority)

Case No. U-21534

ALJ Sally Wallace

**REBUTTAL TESTIMONY OF LINDSEY R. STEGALL
ON BEHALF OF EVGO SERVICES, LLC**

AUGUST 16, 2024

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1 **I. INTRODUCTION AND PURPOSE OF TESTIMONY**

2 **Q: Please state your name, title and business address.**

3 A: My name is Lindsey R. Stegall. I am a Senior Manager of Market Development and Public
4 Policy at EVgo Services, LLC (EVgo). EVgo’s business address is 11835 W. Olympic
5 Blvd. Suite 900E Los Angeles, CA 90064.

6 **Q: Are you the same Lindsey R. Stegall that submitted direct testimony on EVgo’s behalf**
7 **in this proceeding?**

8 A: Yes.

9 **Q: What is the purpose of your rebuttal testimony?**

10 A: The purpose of my rebuttal testimony is to respond to the direct testimony of:

- 11 • Michigan Public Service Commission Staff (Staff) witness Freeman and Attorney
12 General (AG) witness Coppola, each of whom address DTE Electric Company’s
13 (DTE or the Company) proposed electric vehicle (EV) program (known as
14 “Charging Forward”) budget;
- 15 • Citizens Utility Board of Michigan, Sierra Club, Michigan Environmental Council
16 and Natural Resources Defense Council (MNSC) witness Jester, who recommends
17 DTE prioritize applicants to its “Business Charger Rebate” program that have
18 received funding through Michigan’s National Electric Vehicle Infrastructure
19 (NEVI) program, and;
- 20 • Walmart, Inc. witness Perry, who recommends the Commission either remove the
21 two-year limitation from Rate Schedule D3 or direct DTE to propose a public EV
22 charging-specific rate informed by data from the alternative Cost of Service Study
23 (COSS) presented in this case, as well as future data, in its next rate case.

1 **Q: Please summarize your recommendations to the Commission.**

2 A: The recommendations I made in direct testimony remain unchanged. I continue to
3 recommend the Commission:

- 4 • Direct DTE to support both corridor *and* community charging locations through the
5 Business Charger Rebate program (similar to the scope of the existing program)
6 and eliminate the requirement that participating sites be located “on route” in both
7 the disadvantaged community (DAC)/rural and the non-DAC/rural subsegments of
8 the program;
- 9 • Direct the Company to reallocate any funds remaining from the existing Business
10 Charger Rebate program on December 31, 2024 into the non-DAC/rural
11 subsegment of the proposed Business Charger Rebate program instead of allowing
12 the utility to determine the reallocation of these funds at a later date; and
- 13 • Adopt DTE’s proposal to take no further action related to the EV Fast Charger rate
14 at this time.

15 Having reviewed the direct testimony submitted by Staff and other intervenors, I further
16 recommend the Commission:

- 17 • Decline to adopt either Staff witness Freeman’s or AG witness Coppola’s
18 recommendations related to DTE’s Charging Forward budget, and approve DTE’s
19 funding request in its entirety;
- 20 • Decline to adopt MNSC witness Jester’s recommendation that DTE prioritize
21 Business Charger Rebate applicants receiving NEVI funding;

- 1 • Adopt Walmart witness Perry’s recommendation to remove the two-year limit on
2 the exemption from the 1,000 kW demand restriction for EV charging stations in
3 Rate Schedule D3; and
- 4 • Decline to adopt Walmart witness Perry’s recommendation that DTE be directed to
5 propose a public EV charging-specific rate informed by data from the alternative
6 COSS presented in this case, as well as future data, in its next rate case proceeding.

7 **II. DTE’S EV PROGRAM BUDGET**

8 **Q: What is the purpose of this section of your testimony?**

9 A: In this section of my testimony, I address Staff witness Freeman’s and AG witness
10 Coppola’s discussion of DTE’s proposed EV program portfolio budget. Both witnesses
11 recommend the Commission significantly reduce DTE’s EV program budget. Staff witness
12 Freeman recommends an \$8,000,000 disallowance to DTE’s Business and eFleet Charger
13 Rebate programs and a \$1,000,000 disallowance to DTE’s Residential Customer Rebate
14 program.¹ AG witness Coppola recommends a 45% reduction to DTE’s forecast capital
15 expenditures for its overall Charging Forward program, which would reduce the
16 Company’s forecast capital expenditures by \$6,979,000 in 2024 and by \$2,295,000 in
17 2025.²

¹ Direct Testimony of Alan Freeman on behalf of MPSC Staff at 8:8-12.

² Direct Testimony of Sebastian Coppola on behalf of AG Dana Nessel at 55:6-11. AG witness Coppola also recommends DTE reduce its forecast spending on utility make-ready (UMR) expenditures—which refers to spending on upgrading and installing utility equipment and facilities to support charging infrastructure—by \$3,734,000 in 2024 and \$10,173,000 in 2025. Direct Testimony of Sebastian Coppola on behalf of AG Dana Nessel at 26:11-12.

1 **Q: Why does witness Freeman recommend reducing DTE’s proposed spending on EV-**
2 **related programs?**

3 A: Staff witness Freeman suggests DTE’s proposed spending on its Business and eFleet
4 Charger Rebates programs (\$16 million in 2025) represents a “significant increase” from
5 past rebate programs and indicates Staff would prefer DTE implement a “scaled down
6 rebate effort.”³

7 **Q: What is your response?**

8 A: While I appreciate Staff’s desire to ensure DTE uses ratepayer dollars responsibly, I
9 respectfully disagree with Mr. Freeman’s recommendation because he (1) mischaracterizes
10 the scale of DTE’s funding request for its Business and eFleet Charger Rebate programs,
11 (2) does not provide evidence for disallowing funding in the Business Charger Rebates
12 program in particular—a program that is both critical and widely popular, (3) does not base
13 his recommendation on any analysis of DTE’s customers’ needs, and (4) does not take into
14 account the ratepayer benefits of these programs. I will explain each of these issues in more
15 detail below.

16 **Q: Please explain your concern with Mr. Freeman’s discussion of the scale of DTE’s**
17 **funding request.**

18 A: EVgo sent MPSC Staff discovery requests to clarify what Mr. Freeman means where he
19 references a “significant increase from past rebate programs.” In response, Mr. Freeman
20 referenced DTE’s actual and estimated Charging Forward spend between 2019 and 2023
21 (\$13,985,000), described in the testimony of DTE witness Peterson in DTE’s last rate case,
22 Case No. U-21297.⁴ Critically, that number does not include the EV program funding

³ Direct Testimony of Alan Freeman on behalf of MPSC Staff at 8:18-22.

⁴ See Exhibit EVG-3 (LRS-3) (MPSC Staff response to EVgo discovery request 1.01c).

1 authorized by the Commission in Case No. U-21297. In that case, the Commission
2 approved a total of \$24.4 million for DTE’s Business and eFleet Charger Rebate programs,
3 including \$5.8 million to exhaust funding from the original Charging Forward pilot through
4 2023, \$6.9 million for eFleets Business Charger Rebates through 2024, and \$11.7 million
5 for expanding Business Charger Rebates through 2024.⁵ Relative to the most recently
6 authorized funding for its EV programs, DTE’s funding request in this case (\$24,980,000
7 in 2025) cannot reasonably be viewed as a “significant increase” over prior funding levels.
8 Rather, DTE’s request, if approved, would steadily scale funding for its EV programs.

9 **Q: Please explain your concern with Mr. Freeman’s proposal to reduce funding for the**
10 **Business Charger Rebate program in particular.**

11 A: Based on his responses to discovery requests issued by EVgo, Mr. Freeman appears to be
12 concerned with the scale of DTE’s **overall** 2025 EV budget (\$24,980,000), and not
13 specifically with the budget dedicated to the Business and eFleet Charger Rebate
14 programs.⁶ Yet, Mr. Freeman’s proposed solution is for the Commission to disallow
15 funding for Business Charger Rebates⁷—incentives that would address a charging use case
16 ranked by stakeholders as “the most important for utility action.”⁸ Mr. Freeman’s solution
17 does not map to his concern, and he does not explain why the Commission should address
18 his concern by cutting funding for a popular, critical element of DTE’s broader EV
19 program.

⁵ Direct Testimony of Pina Bennett on behalf of DTE at PB-8:17-21.

⁶ See Exhibit EVG-3 (LRS-3) (MPSC Staff response to EVgo discovery request 1.01a).

⁷ See Exhibit EVG-3 (LRS-3) (MPSC Staff response to EVgo discovery request 1.02a, confirming Mr. Freeman believes the Commission should disallow \$8,000,000 in funding from both Business Charger Rebates and eFleet rebates).

⁸ Direct Testimony of Pina Bennett on behalf of DTE at PB-46:2.

1 **Q: Please explain your concern related to DTE’s customers’ needs.**

2 A: Mr. Freeman recommends disallowing \$8,000,000 from DTE’s Business Charger Rebate
3 and eFleet Charger Rebate programs, but does not ground his recommendation in any
4 analysis of DTE’s customers’ needs. In contrast, DTE’s funding request is grounded in its
5 analysis of the forecasted market size for EV registrations in its service territory;⁹ an
6 analysis of the charging infrastructure required to support forecasted EV adoption;¹⁰ and
7 stakeholder engagement,¹¹ each of which are described in detail in DTE witness Bennett’s
8 testimony. With respect to Business Charger Rebates for public charging use-cases, DTE
9 notes “[s]takeholders ranked all the public charging subsegments, including on-route and
10 destination charging, as the most important for utility action[.]”¹² DTE’s proposal to
11 steadily scale funding for Business Charger rebates is therefore well-supported,
12 appropriately tailored to the needs of its customers, and consistent with the state’s goals
13 related to electrifying the transportation sector.

14 **Q: Please explain your concern with Mr. Freeman’s oversight related to considering the**
15 **ratepayer benefits of EV charging infrastructure programs.**

16 A: Mr. Freeman’s recommendation does not appear to consider the ratepayer benefits
17 associated with transportation electrification programs, nor does it balance those benefits
18 against program costs. As I explained in direct testimony, programs that expand EV fast-
19 charging infrastructure promote wider EV adoption and increased charging. This leads to
20 increased electric load for which costs are distributed across a greater number of customers,
21 thereby putting downward pressure on future rates. A 2024 Synapse Economics study

⁹ *Id.* at PB-23:5-PB-25:4.

¹⁰ *Id.* at PB-25:6-PB-28:18.

¹¹ *Id.* at PB-31:22-PB-35:13.

¹² *Id.* at PB-46:1-3.

1 found that EVs have increased utility revenues more than costs nationwide, resulting in
2 lower electric rates for all customers. From 2011 to 2021, EV drivers contributed \$3.12
3 billion more in revenues than associated costs, resulting in benefits for all ratepayers. The
4 economic benefits of TE for ratepayers are widely recognized by utilities and public service
5 commissions across the country and should be considered along with the costs of these
6 programs.¹³

7 **Q: Why does witness Coppola recommend reducing DTE’s proposed spending on EV-**
8 **related programs?**

9 A: Mr. Coppola makes a series of claims about the health of the EV market. In his direct
10 testimony, Mr. Coppola alludes to issues ranging from the level of inventory at dealers’
11 lots, to the satisfaction levels of EV drivers, to equipment reliability, to EV manufacturers’
12 production schedules—without offering any specific support for his broad assertions.
13 Through discovery, Mr. Coppola provided seven news articles on which he relied,
14 including two articles related specifically to the earnings of Tesla and two articles related
15 to the European EV market. None of these articles were specific to the EV market in the
16 state of Michigan or in DTE’s service territory. Further, Mr. Coppola does not attempt to
17 connect the various issues he lists to the specific needs of DTEs’ customers within each
18 Charging Forward subsegment (*i.e.*, residential, multi-unit dwelling; public charging; fleet
19 charging; etc.), nor does he address DTE witness Bennett’s quantitative analysis of those
20 needs. Instead, Mr. Coppola requests the Commission indiscriminately reduce the overall
21 budget for DTE’s highly successful Charging Forward program.

¹³ Direct Testimony of Lindsey R. Stegall on behalf of EVgo at 6:5-7:9.

1 **Q: How do you respond?**

2 A: Mr. Coppola’s testimony is concerning because he provides little evidence to support his
3 broad assertions. Putting aside Mr. Coppola’s oversight in not connecting his diagnosis of
4 the EV market with the needs of DTE’s customers within each Charging Forward
5 subsegment, Mr. Coppola’s diagnosis is both inaccurate and misleading.

6 **Q: Please elaborate.**

7 A: As DTE witness Bennett’s testimony explains in detail, EV sales are accelerating—not
8 slowing down, suggesting that consumer demand for EVs remains healthy. At the national
9 level, a record 1.2 million new EVs were sold in 2023.¹⁴ That trend has continued in 2024—
10 a record-high 330,463 EVs were sold in the second quarter of 2024, representing an 11.3%
11 increase relative to the second quarter of 2023.¹⁵ Growth in non-Tesla EV sales has been
12 exceptionally strong, with 35% year-over-year growth in the second quarter of 2024.¹⁶ This
13 growth in non-Tesla EV sales is notable, as these vehicles are those most likely to rely on
14 charging networks like EVgo’s for their fueling needs. According to DTE witness Bennett,
15 these trends extend to DTE’s service territory—the Company forecasts total EV
16 registration growth in its service territory from 46,000 in 2023 to 65,000 in 2024, and to
17 326,000 by 2028,¹⁷ the end of the first cycle of its proposed Transportation Electrification
18 Plan (TEP)—a 600% increase compared to 2023.

19 Increasing sales are driven in part by declining prices and increased availability of
20 affordable vehicle models for consumers. Two years ago, the average EV was

¹⁴ See Cox Automotive, “A Record 1.2 Million EVs Were Sold in the U.S. in 2023, According to Estimates from Kelley Blue Book.” Jan. 9, 2024. Available at: <https://www.coxautoinc.com/market-insights/q4-2023-ev-sales/>.

¹⁵ See Cox Automotive, “Despite Tesla Slide, EV Sales in Q2 Mark New Record.” Jul. 11, 2024. Available at: <https://www.coxautoinc.com/market-insights/q2-2024-ev-sales/>.

¹⁶ See EVgo Investor Relations, EVgo Q2 Investor Presentation. Available at: <https://investors.evgo.com/overview/default.aspx>.

¹⁷ Direct Testimony of Pina Bennett on behalf of DTE at PB-24:1-2.

1 approximately 33% more expensive than the average internal combustion engine (ICE)
2 vehicle, whereas at of the end of last year, the price of an average EV was almost at parity
3 with the average ICE vehicle without incentives.¹⁸ Further, industry projections suggest
4 that 38 EV models with price points less than \$35,000 will be available within the next 18
5 months and average EV sales prices will be lower than average ICE vehicles in 2026.¹⁹

6 In sum, the evidence is clear that the EV market is growing and programs that
7 provide support for fast charging infrastructure will only serve to further accelerate this
8 growth.

9 **Q: Do you have any other concerns about Mr. Coppola’s testimony regarding DTE’s**
10 **Charging Forward budget?**

11 A: Yes. Even if Mr. Coppola’s diagnosis of the EV market were accurate, his recommended
12 solution would only exacerbate the issues he describes. DTE’s Charging Forward programs
13 are primarily *charging infrastructure* programs, aimed in part at reducing customers’ range
14 anxiety²⁰ and spurring EV adoption. Furthermore, a recent study conducted by Pew
15 Research Center found that “Americans who live close to public chargers view EVs more
16 positively than those who are farther away,”²¹ which suggests that increasing exposure to
17 EV charging infrastructure by deploying it in communities is key to driving EV adoption.
18 Slashing the budget for these programs would discourage the deployment of public EV

¹⁸ See Cox Automotive, “New-Vehicle Transaction Prices Decline Further in September, Led by Price Cuts at Tesla, According to Kelley Blue Book Report.” Oct. 11, 2023. Available at: <https://www.coxautoinc.com/market-insights/kbb-atp-september-2023/>.

¹⁹ See EVgo Investor Relations, EVgo Q2 Investor Presentation. Available at: <https://investors.evgo.com/overview/default.aspx>.

²⁰ Direct Testimony of Pina Bennett on behalf of DTE at PB-46:3.

²¹ See Samuel Bestvater and Sono Shah, Pew Research Center, “Electric Vehicle Charging Infrastructure in the U.S. (May 23, 2024). Available at: <https://www.pewresearch.org/data-labs/2024/05/23/electric-vehicle-charging-infrastructure-in-the-u-s/>.

1 charging which would do little to help DTE’s customers considering an EV purchase, or
2 DTE’s customers who are already EV drivers.

3 **Q: What do you recommend to the Commission with respect to Staff witness Freeman
4 and AG witness Coppola’s recommendation regarding DTE’s Charging Forward
5 budget?**

6 A: I recommend the Commission decline to adopt Staff witness Freeman’s and AG witness
7 Coppola’s recommendations.

8 **III. PUBLIC CHARGING PROGRAM PRIORITIZATION CRITERIA**

9 **Q: What is the purpose of this section of your testimony?**

10 A: In this section of my testimony, I address MNSC witness Jester’s recommendation
11 regarding DTE’s evaluation of applicants to its Business Charger Rebate program—a
12 program my direct testimony addresses at length.

13 **Q: Please summarize Mr. Jester’s recommendation.**

14 A: Mr. Jester recommends DTE prioritize Business Charger Rebate program applications
15 from prospective participants that are also seeking (or have secured) funding through
16 Michigan’s NEVI program.²²

17 **Q: How do you respond?**

18 A: As I understand Mr. Jester’s testimony, his view is that prioritizing participants that are
19 seeking or have secured NEVI funding will help ensure DTE’s programs complement
20 federal funding for transportation electrification. While I support the general goal of
21 coordinating federal, state, and utility programs, seeking to maximize “stacking” of

²² Direct Testimony of Douglas B. Jester on behalf of MNSC at 39:3-5.

1 funding is not the optimal strategy for coordination and is likely to diminish the
2 effectiveness and cost-efficiency of DTE’s Business Charger Rebate program.

3 **Q: Please elaborate**

4 A: As Mr. Jester explains, the NEVI program provides support for up to 80% of project costs.²³
5 Projects receiving NEVI funding, therefore, are less likely to require *additional* funding
6 from DTE in order to be built—those projects are likely to be built through the NEVI
7 program without incremental support. Prioritizing applicants that have received NEVI
8 funding would increase the number of free riders on DTE’s programs—in this case, those
9 who would have developed sites with NEVI funding alone.

10 Instead of providing additional funding to sites already receiving substantial
11 funding, DTE should aim to support projects that do not qualify for NEVI funding, such as
12 sites in community locations, as these sites may not be developed without utility program
13 support. This approach will serve to fill gaps in the charging network left by the NEVI
14 program and will support the deployment of projects at “community” locations—public
15 chargers in urban and suburban areas away from corridors, where not every home has a
16 driveway, attached garage, or dedicated parking. As I explained in my direct testimony,
17 community fast charging is particularly important for drivers that do not have access to
18 home charging and is key to enabling equity goals.²⁴ By prioritizing projects that do not
19 qualify for NEVI funding, DTE can not only increase the number of chargers deployed in
20 DTE’s service territory but also broaden the geographic distribution of those chargers.

21 Targeting projects that do not qualify for NEVI funding in the Business Charger
22 Rebate program will also ensure that ratepayer funding is used efficiently—directed toward

²³ *Id.* at 38:5-8.

²⁴ Direct Testimony of Lindsey R. Stegall on behalf of EVgo at 5:19-6:4.

1 sites that require support for development, rather than those that would have been built
2 regardless, leveraging funding from the federal government.

3 **Q: What do you recommend to the Commission with respect to Mr. Jester's**
4 **recommendation?**

5 A: I recommend the Commission decline to adopt Mr. Jester's recommendation.

6 **IV. RATE DESIGN FOR EV FAST CHARGING**

7 **Q: What is the purpose of this section of your testimony?**

8 A: In this section of my testimony, I respond to Walmart witness Perry's discussion of DTE's
9 Rate Schedule D3 and DTE's alternative COSS and EV Fast Charger rate.

10 **Q: Please explain Rate Schedule D3 as it applies to EV fast-charging customers.**

11 A: Rate Schedule D3—which does not include demand charges—is typically available to
12 commercial customers with a demand lower than 1,000 kW, including EV fast-charging
13 customers that fall below that limit. The rate also includes an exemption from the 1,000-
14 kW demand restriction for EV charging stations until January 1, 2026, enabling EV
15 charging stations with greater demand to access the rate until that time.

16 **Q: Please summarize Ms. Perry's testimony regarding Schedule D3 and the rate design**
17 **for EV fast charging.**

18 A: Ms. Perry, along with MEIU witness Dr. Sherman and other intervenors,²⁵ expresses
19 concern over the limited availability of Rate Schedule D3 to separately metered DC fast
20 chargers, and explains that a more durable rate for EV fast chargers would foster market
21 certainty and encourage investments in public EV charging.²⁶ Ms. Perry does not support
22 the approval of an EV fast charging-specific rate based on the alternative COSS DTE

²⁵ See, e.g. Direct Testimony of Jigar Shah on behalf of Electrify America at 2-5.

²⁶ Direct Testimony of Lisa V. Perry on behalf of Walmart, Inc. at 24:7-10.

1 presented in this rate case because the data used in that study is limited.²⁷ To address the
2 lack of viable and durable rate options for EV fast chargers, Ms. Perry recommends the
3 Commission direct DTE to “either remove the two-year limitation from Rate Schedule D3
4 or require the Company to collaborate with interested parties to develop a public EV
5 charging-specific rate that is informed by data from the alternative COSS presented in this
6 case as well as future data, and require the Company to seek approval of such rate in its
7 next general rate case.”²⁸

8 **Q: How do you respond to Ms. Perry’s recommendation?**

9 A: I share Ms. Perry’s concern and I support the first option she recommends, which I interpret
10 to mean removing the two-year limit on the exemption from the 1,000 kW demand
11 restriction for EV charging stations in Rate Schedule D3. This will create a more inclusive
12 rate that will promote market certainty over the long term and foster private investment in
13 EV charging, particularly as charger power levels trend upward to accommodate increasing
14 vehicle charging speeds.

15 However, I recommend the Commission decline to adopt the second option
16 recommended by Ms. Perry—requiring the Company to seek approval of an EV charging-
17 specific rate that is informed by data from the alternative COSS presented in this case as
18 well as future data *in its next general rate case*. Considering the issues with the data sample
19 size and quality related to the EV Fast Charger Rate, which DTE has acknowledged, and
20 given that DTE typically files rate cases on an annual basis, similar data challenges are
21 likely to exist in next year’s rate case.

²⁷ *Id.* at 24:3-6.

²⁸ *Id.* at 24:14-17.

1 **Q: Do you have any further recommendations related to this topic?**

2 A: Yes. If the Commission declines to remove the two-year exemption limit in Rate Schedule
3 D3, I recommend the Commission direct DTE to collaborate with stakeholders to develop
4 an optional successor rate to Schedule D3 for EV fast-charging customers which should be
5 available upon the expiration of the Schedule D3 exemption from the demand restriction
6 for EV charging stations. Developing this optional EV fast-charging rate should not
7 necessitate creating a separate EV fast-charging rate class. As I explained in my direct
8 testimony, many Commissions across the country have approved EV fast charging rates,
9 though EV charging customers are rarely, if ever, placed in a separate rate class.²⁹ EVgo
10 would be happy to collaborate with DTE and share best practices from across the country
11 through the stakeholder process I recommend.

12 **V. CONCLUSION**

13 **Q: Does this conclude your rebuttal testimony?**

14 A: Yes.

²⁹ Direct Testimony of Lindsey R. Stegall on behalf of EVgo at 18:5-19:2.

Exhibit List

Exhibit	Title
EVG-1 (LRS-1)	Compiled discovery responses
EVG-2 (LRS-2)	EVgo and ChargePoint comments on DTE's draft TEP
EVG-3 (LRS-3)	Compiled MPSC Staff responses to EVgo DR 1

MPSC Staff's Answer to the EVgo's First Discovery Request
MPSC Case No. U-21534
August 9, 2024

Question:

EVgo-MPSC 1.01 EVgo-MPSC 1.01. Refer to page 8, lines 20-21 of Mr. Freeman's direct testimony, where he states: "Staff is uncomfortable with this large, requested amount. It represents a significant increase from past rebate programs."

- a. Please explain the "amount" Mr. Freeman is referring to with the phrase "this large, requested amount." Is Mr. Freeman referring to DTE's request to spend \$16,002,000 on Business and eFleet Charger Rebates in 2025, its proposed \$24,980,000 EV budget in 2025, or some other amount?

Answer:

My phrase "this large, requested amount" refers to DTE Electric's 2025 proposed \$24,980,000 EV budget.

Respondent: Al Freeman

MPSC Staff's Answer to the EVgo's First Discovery Request
MPSC Case No. U-21534
August 9, 2024

Question:

1b: Please identify the “past rebate programs” mentioned in the second sentence of the referenced portion of Mr. Freeman’s testimony, and provide the budget or cost recovery request associated with those “past rebate programs.”

Answer:

The “past rebate programs” refer to DTE Electric witness Kelsey Peterson’s testimony in U-21297. Specifically, I am referring to her Tables 1 and 2 on pages 5-6 of her testimony.

Respondent: Al Freeman

MPSC Staff's Answer to the EVgo's First Discovery Request
MPSC Case No. U-21534
August 9, 2024

Question:

1c. Please identify the amount of the “significant increase” to which Mr. Freeman refers.

Answer:

The “significant increase” refers to the \$13,985,000 for the actual and estimated pilot spend from company witness Peterson’s testimony.

Respondent: Al Freeman

MPSC Staff's Answer to the EVgo's First Discovery Request
MPSC Case No. U-21534
August 9, 2024

Question:

EVgo-MPSC 1.02. Refer to page 8 of witness Freeman's direct testimony, which recommends an \$8,000,000 disallowance to the Company's Business and eFleet Charger Rebates program, stating "[t]he Business and eFleet Charger Rebates \$16 million request is the foundational piece of the Company's overall \$24,980,000 proposed EV budget request."

- a. Does Mr. Freeman take any position on whether his recommended \$8,000,000 disallowance should reduce DTE's Business Charger Rebate budget, its eFleet Charger Rebate budget, or both? If the answer is anything other than "no", please explain Mr. Freeman's position.

Answer:

The \$8,000,000 disallowance should come from both the DTE Electric's Business Charger Rebate Program and its eFleet Charger Rebate budget.

Respondent: Al Freeman

MPSC Staff's Answer to the EVgo's First Discovery Request
MPSC Case No. U-21534
August 9, 2024

Question: 2b. Is it Mr. Freeman's position that DTE should reduce its proposed budget for Business and eFleet Charger rebates in 2026, 2027 and 2028 (described at Table 9 of DTE witness Bennett's testimony) by the amount of his recommended disallowance? If the answer is anything other than "yes", please explain Mr. Freeman's position on DTE's proposed investment in Business and eFleet Charger rebates in 2026, 2027 and 2028.

Answer:

My position is that DTE Electric should reduce its proposed budget for the Business and eFleet Charger Rebates for the bridge and test years specified in the Case No. U-21534. DTE Electric is welcome to revisit this issue in their next rate case. The EV marketplace is evolving and in the future larger rebates may be appropriate at that time.

Respondent: Al Freeman

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) ALJ Sally Wallace
supply of electric energy, and for)
miscellaneous accounting authority)

PROOF OF SERVICE

On August 16, 2024, an electronic copy of **Rebuttal Testimony of Lindsey Stegall on behalf of EVgo Services, LLC and Exhibit EVG-3 (LRS-3)** was served on the following via email:

Name/Party	Email Address
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The statements above are true to the best of my knowledge, information and belief.

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