



Via Electronic Case Filing

September 17, 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.

EVgo Exhibit List
Exhibit EVG-1 (LRS-1)
Exhibit EVG-2 (LRS-2)
Exhibit EVG-3 (LRS-3)
Proof of Service

Thank you for your consideration.

Sincerely,

/s/ Nikhil Vijaykar

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Counsel to EVgo Services, LLC

CC: Parties to Case No. U-21534

EVgo Services, LLC 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 Case No: U-21534

Requester: Evgo

Question No.: EVgoDE-1.1d

Respondent: P. Bennett

Page: 1 of 1

Question: In the Commission's Final Order in Docket No. U-21297, the Commission approved the continuation and expansion of DTE's Business Charger Rebate program and approved DTE's funding request for that program.

Please provide:

d. The total amount of funding that remains available (unawarded) to applicants under the Business Charger Rebate program, as of the date of the Company's response to this discovery request.

Answer: The total amount of funding that remains available to applications under DTE Electric's Business Charger Rebate program, as of May 17th, is approximately \$5 million.

Attachment: *None*

MPSC Case No: U-21534

Requester: Evgo

Question No.: EVgoDE-1.2

Respondent: P. Bennett

Page: 1 of 1

Question: In the Commission's Final Order in Docket No. U-21297, the Commission approved the continuation and expansion of DTE's Business Charger Rebate program and approved DTE's funding request for that program. If funding remains available (unawarded) to applicants under the Business Charger Rebates program as of the date of the Company's response to this discovery request, please explain if the Company plans on continuing to make that funding available to applicants until a) that funding is depleted, or b) some date certain, or c) some other date.

Answer: The Company plans on continuing to make the funding that is available (unawarded) to applicants under the Business Charger Rebate program, as of May 17, 2024, available to applicants until 12/31/2024 contingent on the site projects being operationalized by 12/31/2024.

Attachment: *None*

MPSC Case No: U-21534

Requester: Evgo

Question No.: EVgoDE-1.3

Respondent: P. Bennett

Page: 1 of 1

Question: In the Commission's Final Order in Docket No. U-21297, the Commission approved the continuation and expansion of DTE's Business Charger Rebate program and approved DTE's funding request for that program. If funding for that program is not depleted by the time the Company's Transportation Electrification Program proposed in this case is implemented, does the Company plan on re-allocating the remaining funds approved for the Business Charger Rebates program? If yes, how does the Company plan on re-allocating those funds?

Answer: If funding for the Business Charger Rebate program is not depleted by the time the Company's proposed Transportation Electrification Program (TEP) is implemented, the Company plans to consult with stakeholders regarding potential reallocation of the remaining funds approved for the Business Charger Rebates program to other programs such as the TEP's Public charging for Other On-route DCFC segment.

Attachment: *None*

MPSC Case No: U-21534

Requester: Evgo

Question No.: EVgoDE-1.4

Respondent: P. Bennett

Page: 1 of 1

Question: Does DTE consider its Business Charger Rebates program to be successful? Please explain.

Answer: DTE Electric considers its Business Charger Rebates program to be successful in that it has installed 310 sites with over 1,400 ports operational as of May 17, 2024. Despite fluctuations in demand, the Company's Business Charger Rebates program results are very near the target of 1,500 ports, which was based on an estimate of approximately 52,000 EVs in DTE Electric's service territory for the current level of EVs on the road, which is close to approximately 50,000 EVs.

Attachment: *None*

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*

EVgo and ChargePoint comments on DTE's draft TEP, shared with DTE via email

Kelsey and DTE Team,

Thank you for your presentation earlier this week and for the opportunity to provide feedback on DTE's proposed 2025-2028 Transportation Electrification Plan. The following feedback represents the perspectives of both EVgo and ChargePoint, and focuses on DTE's plan to limit the availability of its Business Charger Rebate program to Disadvantaged Community (DAC) and rural on-route DCFC charging stations.

EVgo and ChargePoint support DTE's Business Charger Rebate program in its current form and recommend DTE extend the availability of this program, without geographic limitations, in the TEP. We advocated for the expansion of the existing Business Charger Rebate program in DTE's pending and most recently completed rate cases, primarily because: 1) the program delivers benefits to DTE, the Company's ratepayers, EV drivers, and society as a whole, and 2) the program is a critical factor driving the steady growth of EV charging infrastructure in DTE's service territory. The broad geographic focus of DTE's existing Business Charger Rebate program is aligned with other utility incentive programs we've observed across the country, of which there are now numerous examples, both in states with slower EV adoption such as New Mexico, Kansas and Utah, and in those with more accelerated adoption, such as California, New York and Colorado.

We are concerned that DTE's proposal to narrow the availability of Business Charger rebates to DACs and rural on-route deployments in its inaugural Transportation Electrification Plan could stall the market's momentum. While the private sector may already be deploying some charging infrastructure outside of DACs and rural corridors in DTE's service territory, we are concerned that a funding cliff will adversely impact market stability in DTE's territory and that public charging deployment is likely to slow absent these rebates. In addition, given that the National Electric Vehicle Infrastructure (NEVI) Formula program will already be supporting sites near corridors—areas similar to DTE's "on-route" areas—it will be important for DTE's program to support chargers in areas that *do not qualify* for NEVI funding. DTE should aim to fill gaps in the charging network left by the NEVI program, thereby supporting broader geographic distribution of charging infrastructure.

With all that said, we understand and appreciate that one of DTE's objectives going forward is to focus Business Charger Rebates in underserved areas. We believe this can be accomplished within a broader Business Charger Rebate program and offer two suggestions to that end. First, DTE could support the deployment of charging infrastructure in underserved areas by providing a higher incentive level for projects located in DAC or rural on-route areas, while continuing to offer a standard incentive level in other areas. Second, DTE could design an application scoring rubric that provides additional points for projects located in certain areas, in order to prioritize underserved locations. These approaches would allow DTE to ensure Business Charger Rebates flow to sites where they are needed the most, without prematurely ending support for sites in the remainder of DTE's service territory. We are familiar with other utility programs that have taken these approaches to promote equitable access to charging and are happy to share examples if DTE is interested.

We look forward to continuing to work with DTE as it develops its Transportation Electrification Plan. Thank you for your consideration of our feedback and please do not hesitate to reach out with any questions.

Best,

Lindsey Stegall

Senior Manager, Market Development & Public Policy
303-941-1729

EVgo

FAST CHARGING



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 September 17, 2024, an electronic copy of **EVgo's Exhibit List** and **Exhibits EVG-1 (LRS-1), EVG-2 (LRS-2), EVG-3 (LRS-3)** was served on the following via email:

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The statements above are true to the best of my knowledge, information and belief.

/s/ Nikhil Vijaykar
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Dated: September 17, 2024