

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF THE CITY OF CRAWFORDSVILLE,)
INDIANA, BY AND THROUGH ITS MUNICIPAL)
ELECTRIC UTILITY, CRAWFORDSVILLE)
ELECTRIC LIGHT AND POWER, FOR APPROVAL)
OF A NEW SCHEDULE OF RATES AND CHARGES)
FOR ELECTRIC SERVICE AND FOR APPROVAL)
TO MODIFY ITS ENERGY COST ADJUSTMENT)
PROCEDURES)

CAUSE NO. 45420

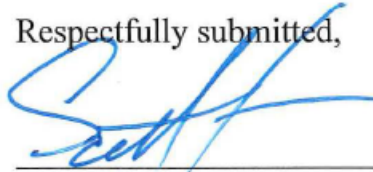
INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

PUBLIC'S EXHIBIT NO. 5

TESTIMONY OF OUCC WITNESS
LAUREN M. AGUILAR

December 23, 2020

Respectfully submitted,



Scott C. Franson
Attorney No. 27839-49
Deputy Consumer Counselor

TESTIMONY OF OUCC WITNESS LAUREN M. AGUILAR
CAUSE NO. 45420
CRAWFORDSVILLE ELECTRIC LIGHT AND POWER

I. INTRODUCTION

1 **Q: Please state your name and business address.**

2 A: My name is Lauren M. Aguilar, and my business address is 115 W. Washington St.,
3 Suite 1500 South, Indianapolis, IN, 46204.

4 **Q: By whom are you employed and in what capacity?**

5 A: I am employed as a Utility Analyst in the Electric Division for the Indiana Office of
6 Utility Consumer Counselor ("OUCC"). Appendix A is a summary of my
7 qualifications.

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

9 A: I present my analysis of Crawfordsville Electric Light and Power's ("CEL&P") electric
10 vehicle ("EV") proposal.

11 **Q: What have you done to evaluate CEL&P's request in this Cause?**

12 A: I reviewed testimony and exhibits submitted in CEL&P's case-in-chief regarding its
13 EV proposal. I generated discovery requests ("DR"), reviewed CEL&P's responses,
14 and participated in teleconference meetings with CEL&P staff. Pertinent CEL&P
15 discovery responses, responses to OUCC DR 10 and DR 12, are attached to my
16 testimony as Attachment LMA-1. I also reviewed prior relevant Indiana Utility
17 Regulatory Commission ("Commission") Orders, and applicable Federal and Indiana
18 laws and regulations.

1 **Q: To the extent you do not address a specific item or adjustment, should it be**
2 **construed to mean you agree with CEL&P's proposal?**

3 A: No. Excluding any specific adjustments or amounts CEL&P proposes does not indicate
4 my approval of those adjustments or amounts. Rather, the scope of my testimony is
5 limited to the specific items addressed herein.

II. EV PROGRAM

6 **Q: Please summarize CEL&P's EV request.**

7 A: CEL&P is requesting to add a tariff for an EV rate, which will be used at any publicly
8 available charging stations in CEL&P's service territory. CEL&P currently has two
9 publicly available charging stations.¹ Any person, not just a CEL&P customer, who
10 uses a publicly available charging station will be charged this rate.² The EV rate will
11 be implemented in two steps, as CEL&P proposes for other aspects of the requested
12 rate increase.

13 **Q: Who is responsible for the costs associated with the EV chargers?**

14 A: CEL&P states that its EV rate is designed to represent: "1. The costs of power supply,
15 delivery, and customer/administrative service; and 2. The costs of certain other items
16 specific to serving public EV charging stations in CEL&P's territory."³ Any other costs
17 associated with the public charging station will be treated below-the-line, and not
18 included in customer rates.⁴

¹ Petitioner's Exhibit 7, Direct Testimony of Andrew J. Reger, page 4, lines 15 to 17.

² Attachment AJR-3.

³ Reger, page 7, lines 3 to 6.

⁴ *Id.* at 9, lines 8 to 11.

1 **Q: Did the OUCC further clarify who would be responsible for the costs associated**
2 **with the EV chargers?**

3 A: Yes. In addition to speaking with CEL&P staff during teleconference meetings, the
4 OUCC issued discovery to further clarify how CEL&P designed the rates and who
5 would be responsible for EV-related costs.⁵

6 **Q: Is the OUCC satisfied with CEL&P's explanation?**

7 A: Yes. The OUCC is satisfied CEL&P has taken the necessary steps to ensure non-
8 participating ratepayers are not subsidizing the EV chargers.

9 **Q: Should CEL&P provide progress reports on its EV program?**

10 A: Yes. Even though the program is not structured as a pilot, EV usage within Indiana is
11 in its infancy; annual reporting on the program will help interested stakeholders and
12 the Commission understand EV usage within the state. The Commission has previously
13 required EV pilot program reporting, acknowledging the importance of collecting data
14 from this accelerating market. In the recent Cause No. 45235 Indiana Michigan Power
15 Company ("I&M") rate case, the Commission discussed the importance of reporting:
16 "[t]he Commission further finds it is *crucial* I&M harvest and report[.]" (emphasis
17 added). While I&M's program is a pilot and CEL&P's is not, Indiana-specific EV data
18 is not yet widely available and the Commission and interested parties would benefit
19 from data gathered from CEL&P's experience.

20 **Q: Has the OUCC discussed these reporting requirements with CEL&P?**

21 A: Yes. The OUCC first discussed these reporting requirements during teleconferences
22 with CEL&P and also sought confirmation through discovery. CEL&P has confirmed

⁵ Attachment LMA-1, pp. 11-13, CEL&P Responses to OUCC DRs 10.3, 10.4, and 10.5.

1 it is willing to provide this information, subject to availability starting December 31,
2 2021.⁶

3 **Q: What EV data would be useful to the Commission and other interested**
4 **stakeholders?**

5 A: While the OUCC acknowledges it is impractical for CEL&P to gather and report all
6 data the Commission required in I&M's rate case; it is reasonable for CEL&P to
7 annually report basic information. The OUCC recommends CEL&P provide reports on
8 public charging station usage and performance and adoption of EVs in CEL&P's
9 service territory with the Commission and the OUCC beginning December 31, 2021,
10 and include data for the preceding 12 months. Thereafter, EV reporting should occur
11 annually. The following data should be provided:

- 12 (1) The number of customers in CEL&P service territory who drive an EV prior
13 to the beginning of the Program, and yearly thereafter;
14 (2) Number of customers using the CEL&P-provided public station each day;
15 (3) Duration of each charge;
16 (4) kWh of each charge;
17 (5) Time of day charges occurred (at the very least, off-peak vs. on-peak);
18 (6) General location of customer (local or out of state) reasonably discernable
19 by CEL&P; and
20 (7) The battery level of the EV prior to charging and the charge level at the
21 conclusion (i.e. was the car empty when it started and full when it left) as is
22 reasonably discernable by CEL&P.

III. RECOMMENDATIONS

23 **Q: What does the OUCC recommend regarding CEL&P's EV program in this**
24 **Cause?**

25 A: The OUCC recommends the Commission approve CEL&P's EV Tariff presented in
26 Petitioner's Attachment AJR-3. The OUCC further recommends the Commission

⁶ Attachment LMA-1, pp. 16-17. CEL&P Responses to OUCC DRs 12.1 and 12.2.

1 require CEL&P to provide annual EV program reports, as described in my testimony

2 and agreed upon by CEL&P.

3 **Q: Does this conclude your testimony?**

4 **A: Yes.**

APPENDIX A

1 **Q: Summarize your professional background and experience.**

2 A: I graduated from Michigan State University in 2008 with a Bachelor of Science degree
3 in Environmental Science and Management. I graduated from Florida State University
4 College of Law in May 2011 with a Juris Doctorate and Environmental Law certificate.
5 I spent over two years while in law school as a certified legal intern, providing pro bono
6 legal services to poverty level residents of Tallahassee, FL. I worked in the legal
7 department of Depuy Synthes, a Johnson & Johnson Company, where I assisted with
8 patent filings and nondisclosure agreements. Starting in 2013, I worked for the Indiana
9 Department of Environmental Management as a rule writer, in which I worked
10 extensively with the public at large, special interests groups, and affected regulated
11 entities to understand the rulemaking process and to respond to their comments on
12 ongoing environmental rules. I joined the OUCC in July of 2017.

13 **Q: Describe some of your duties at the OUCC.**

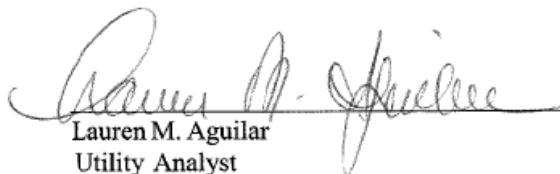
14 A: I review and analyze utilities' requests and file recommendations on behalf of
15 consumers in utility proceedings. As applicable, my duties may also include analyzing
16 state and federal regulations, evaluating rate design and tariffs, examining books and
17 records, inspecting facilities, and preparing various studies.

18 **Q: Have you testified before the Indiana Utility Regulatory Commission?**

19 A: Yes. I have previously testified in Cause Nos. I have previously testified in Cause Nos.
20 42170 ECR -30, 44340 FMCA-9, 44340 FMCA-10, 44340 FMCA-11, 44340 FMCA-
21 12, 44340 FMCA-13, 44963, 44978, 44981, 44998, 45010, 45047, 45052, 45071,
22 45194, 45197, 45235, 45253, 45253 S2, 45336, 45361, 45403.

AFFIRMATION

I affirm, under the penalties for perjury, that the foregoing representations are true.

A handwritten signature in cursive script, appearing to read "Lauren M. Aguilar", written over a horizontal line.

Lauren M. Aguilar
Utility Analyst

Indiana Office of Utility Consumer Counselor

Cause No. 45420
Crawfordsville Electric Light and Power

Date: December 23, 2020

Q10.1: How many public electric vehicle charging stations does CEL&P have? How many public electric vehicle charging stations did does CEL&P have as of February 29, 2020 and September 30, 2020?

Response: As of both of these dates, CEL&P had two public electric vehicle charging stations. The chargers are located at the Crawfordsville District Public Library at 205 S. Washington St. and the Dr. Philip Q. Michal Trailhead Park at 510 S. Washington St.

Q10.2: Does CEL&P pay an annual subscription fee to ChargePoint for electric vehicle charging services? If yes, please state the annual subscription fee. Please provide the amount paid during the test year.

Response: Pursuant to the CEL&P's agreement with Charge Point (Attachment DR 10.2), the annual subscription fee is \$5,000 for two stations (\$2,500 per year per station).



Quotation

ChargePoint, Inc.
Driving a Better Way™
chargepoint.com

Sales Representative: Brian Levin
E-Mail: brian.levin@chargepoint.com
Telephone: 8479036652

Quote Number: Q-35736-1
Date: 9/19/2018
Expires On: 10/10/2018

Primary Contact: John Douglas

Bill To Address

Crawfordsville Electric Light & Power
John Douglas
808 Lafayette Road
Crawfordsville IN 47933
USA
johnd@celp.com
(765) 307-2783

Ship To Address

TBD
Crawfordsville Electric Light & Power

ChargePoint as a Service

ChargePoint® as a Service (CPaaS) is the easiest way to provide electric vehicle (EV) charging solutions without having to purchase and maintain everything yourself. You get the site ready, and for an annual subscription fee ChargePoint takes care of the installation, monitoring and maintenance to provide maximum uptime with minimum effort.

5yr subscription ChargePoint as a Service.
Includes full suite of charging services.

Product Name		Year 1	Year 2	Year 3	Year 4	Year 5
CPAAS-DUAL-5						
	Price Per Year/ Station	USD 2,500	USD 2,500	USD 2,500	USD 2,500	USD 2,500
	Quantity	2	2	2	2	2
	Annual Billing Total	USD 5,000	USD 5,000	USD 5,000	USD 5,000	USD 5,000
	Estimated Tax					
	Annual Billing Grand Total	USD 5,000.00	USD 5,000.00	USD 5,000.00	USD 5,000.00	USD 5,000.00

Quote Total: USD 25,000.00

ChargePoint as a Service Grand Total: USD 25,000.00

Note:

© 2018 ChargePoint, Inc.



Sales tax in applicable states (AZ, CA, FL, GA, MA, NY, PA, TX, WA) will be applied to this quote at time of invoicing.

Quote Acceptance

** By signing this quote Customer is agreeing to the terms and conditions of the ChargePoint as a Service Agreement (v.1.15.18-RRL) available at <https://www.chargepoint.com/legal/cpaas>

Signature :

A handwritten signature in black ink, appearing to read "John A. Douglas".

Title : Customer Service Director

Name (Print) :

John A. Douglas

Date : 9/20/2018

Company Name :

Crawfordsville Electric Light & Power

Requested Ship Date :

ASAP

AP Contact Name :

Andrea McArthur

AP Contact E-Mail :

amcarthur@celp.com

** Crawfordsville would like to opt-in to the IMPA version of the ChargePoint Service Agreement



CT4000 Level 2 Commercial Charging Station

Specifications and Ordering Information

Ordering Information

Specify model number followed by the applicable code(s).
 The order code sequence is: **Model-Options. Software, Services**
 and **Misc** are ordered as separate line items.

Hardware

Description	Order Code
Model	
1830 mm (6') Single Port Bollard Mount	CT4011
1830 mm (6') Dual Port Bollard Mount	CT4021
1830 mm (6') Single Port Wall Mount	CT4013
1830 mm (6') Dual Port Wall Mount	CT4023
2440 mm (8') Dual Port Bollard Mount	CT4025
2440 mm (8') Dual Port Wall Mount	CT4027
Options	
Integral Gateway Modem - USA	-GW1
Integral Gateway Modem - Canada	-GW2
Misc	
Power Management Kit	CT4000-PMGMT
Bollard Concrete Mounting Kit	CT4001-CCM

Software & Services

Description	Order Code
ChargePoint Commercial Service Plan	CTSW-SAS-COMM- <i>n</i> ¹
ChargePoint Service Provider Plan	CTSW-SAS-SP- <i>n</i> ¹
ChargePoint Assure	CT4000-ASSURE ²
Station Activation and Configuration	CPSUPPORT-ACTIVE
ChargePoint Station Installation and Validation	CT4000-INSTALLVALID

Note: All CT4000 stations require a network service plan.

¹ Substitute *n* for desired years of service (1, 2, 3, 4, or 5 years).

² Substitute *n* for the duration of the coverage (1, 2, 3, 4, or 5 years).

Order Code Examples

If ordering this	the order code is
1830 mm (6') Dual Port Bollard USA Gateway Station with Concrete Mounting Kit	CT4021-GW1 CT4001-CCM
ChargePoint Commercial Service Plan, 3 Year Subscription	CTSW-SAS-COMM-3
ChargePoint Station Installation and Validation	CT4000-INSTALLVALID
2 Years of Assure Coverage	CT4000-ASSURE2
1830 mm (6') Single Port Wall Mount Station	CT4013
ChargePoint Commercial Service Plan, 5 Year Subscription	CTSW-SAS-COMM-5
4 Years of Assure Coverage	CT4000-ASSURE4
Station Activation and Configuration	CPSUPPORT-ACTIVE

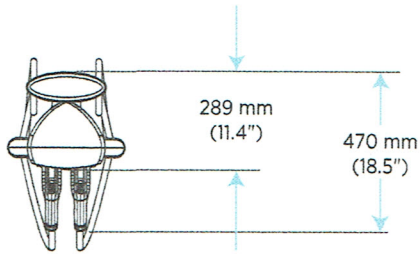


CT4021

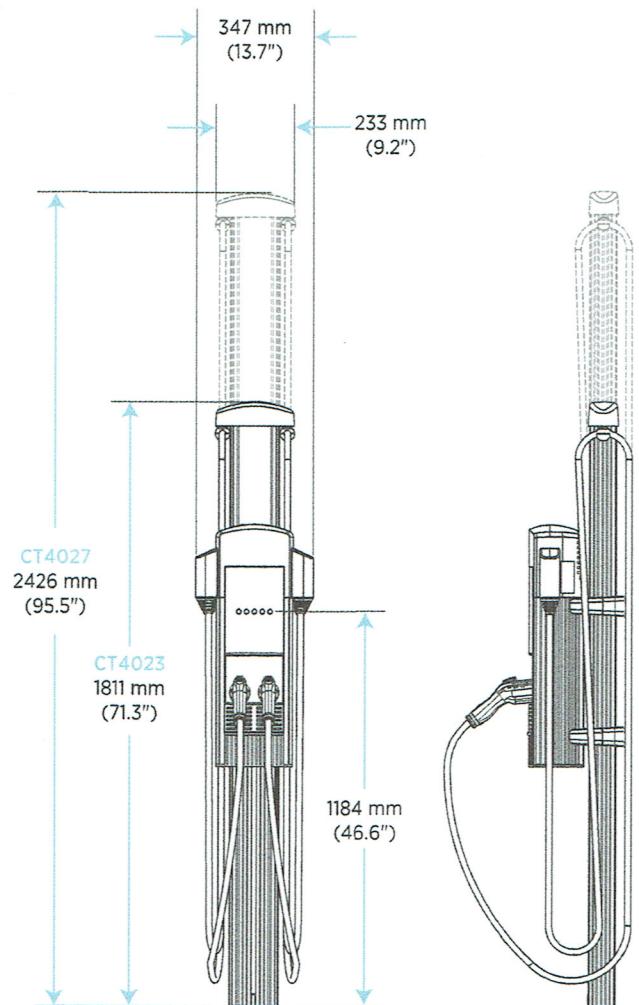
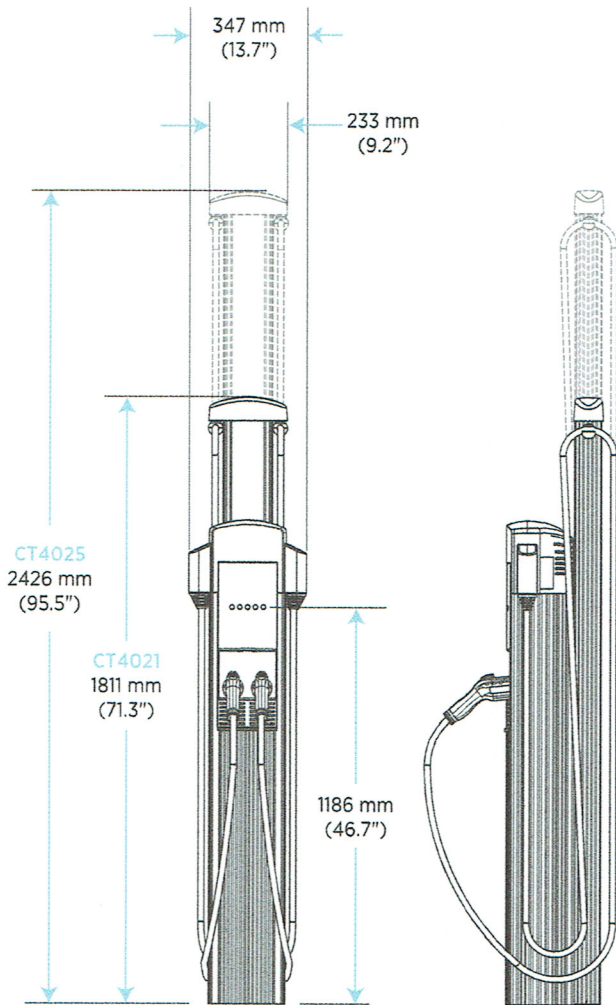
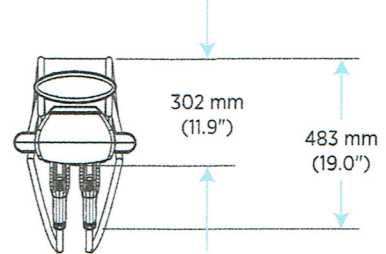


The First
ENERGY STAR[®]
 Certified EV Charger

CT4021 1830 mm (6')
CT4025 2440 mm (8')
Bollard



CT4023 1830 mm (6')
CT4027 2440 mm (8')
Wall Mount



CT4000 Family Specifications

Electrical Input	Single Port (AC Voltage 208/240V AC)			Dual Port (AC Voltage 208/240V AC)		
	Input Current	Input Power Connection	Required Service Panel Breaker	input Current	Input Power Connection	Required Service Panel Breaker
Standard	30A	One 40A branch circuit	40A dual pole (non-GFCI type)	30A x 2	Two independent 40A branch circuits	40A dual pole (non-GFCI type) x 2
Standard Power Share	n/a	n/a	n/a	32A	One 40A branch circuit	40A dual pole (non-GFCI type)
Power Select 24A	24A	One 30A branch circuit	30A dual pole (non-GFCI type)	24A x 2	Two independent 30A branch circuits	30A dual pole (non-GFCI type) x 2
Power Select 24A Power Share	n/a	n/a	n/a	24A	One 30A branch circuit	30A dual pole (non-GFCI type)
Power Select 16A	16A	One 20A branch circuit	20A dual pole (non-GFCI type)	16A x 2	Two independent 20A branch circuits	20A dual pole (non-GFCI type) x 2
Power Select 16A Power Share	n/a	n/a	n/a	16A	One 20A branch circuit	20A dual pole (non-GFCI type)
Service Panel GFCI	Do not provide external GFCI as it may conflict with internal GFCI (CCID)					
Wiring - Standard	3-wire (L1, L2, Earth)			5-wire (L1, L1, L2, L2, Earth)		
Wiring - Power Share	n/a			3-wire (L1, L2, Earth)		
Station Power	8W typical (standby), 15W maximum (operation)					

Electrical Output

Standard	7.2kW (240V AC @ 30A)	7.2kW (240V AC@30A) x 2
Standard Power Share	n/a	7.2kW (240V AC@30A) x 1 or 3.8kW (240V AC@16A) x 2
Power Select 24A	5.8kW (240V AC@24A)	5.8kW (240V AC@24A) x 2
Power Select 24A Power Share	n/a	5.8kW (240V AC@24A) x 1 or 2.9kW (240V AC@12A) x 2
Power Select 16A	3.8kW (240V AC@16A)	3.8kW (240V AC@16A) x 2
Power Select 24A Power Share	n/a	3.8kW (240V AC@16A) x 1 or 1.9kW (240V AC@8A) x 2

Functional Interfaces

Connector(s) Type	SAE J1772™	SAE J1772™ x 2
Cable Length - 1830 mm (6') Cable Management	5.5 m (18')	5.5 m (18') x 2
Cable Length - 2440 mm (8') Cable Management	n/a	7 m (23')
Overhead Cable Management System	Yes	
LCD Display	145 mm (5.7") full color, 640x480, 30fps full motion video, active matrix, UV protected	
Card Reader	ISO 15693, ISO 14443, NFC	
Locking Holster	Yes	Yes x 2

Safety and Connectivity Features




Ground Fault Detection	20mA CCID with auto retry
Open Safety Ground Detection	Continuously monitors presence of safety (green wire) ground connection
Plug-Out Detection	Power terminated per SAE J1772™ specifications
Power Measurement Accuracy	+/- 2% from 2% to full scale (30A)
Power Report/Store Interval	15 minute, aligned to hour
Local Area Network	2.4 GHz Wi-Fi (802.11 b/g/n)
Wide Area Network	3G GSM, 3G CDMA

Safety and Operational Ratings

Enclosure Rating	Type 3R per UL 50E
Safety Compliance	UL listed for USA and cUL certified for Canada; complies with UL 2594, UL 2231-1, UL 2231-2, and NEC Article 625
Surge Protection	6kV @ 3000A. In geographic areas subject to frequent thunder storms, supplemental surge protection at the service panel is recommended.
EMC Compliance	FCC Part 15 Class A
Operating Temperature	-30°C to +50°C (-22°F to 122°F)
Storage Temperature	-30°C to +60°C (-22°F to 140°F)
Non-Operating Temperature	-40°C to +60°C (-40°F to 140°F)
Operating Humidity	Up to 85% @ +50°C (122°F) non-condensing
Non-Operating Humidity	Up to 95% @ +50°C (122°F) non-condensing
Terminal Block Temperature Rating	105°C (221°F)
Charging Stations per 802.11 Radio Group	Maximum of 10. Each station must be located within 45m (150') "line of sight" of a gateway station.

ChargePoint, Inc. reserves the right to alter product offerings and specifications at any time without notice, and is not responsible for typographical or graphical errors that may appear in this document.

Contact Us

-  Visit [chargepoint.com](https://www.chargepoint.com)
-  Call +1.408.705.1992
-  Email sales@chargepoint.com



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ChargePoint Assure

Industry-leading support, maintenance and warranty deliver peace of mind.

ChargePoint® Assure is the most comprehensive EV station maintenance and management program. Assure covers everything needed to keep ChargePoint electric vehicle (EV) charging stations up and running. With Assure, ChargePoint takes responsibility for fixing hardware issues by providing parts, labor and orchestration of repairs by expert support specialists. Proactive monitoring, regular reports and unlimited changes to station policies are included with Assure, as well as one business day response to requests and a 98% annual uptime guarantee. You can also get professional guidance when configuring your stations to make the most of EV charging.

ChargePoint EV charging stations are the most advanced and reliable in the world, but site conditions can change, wear and tear occurs, and accidents or equipment failures can happen. High-quality service and support start with high-quality products, site preparation and installation, but these elements alone aren't enough. Assure is so much more than a warranty. It is the most comprehensive EV station maintenance and management program. With Assure, you don't have to spend time figuring out how to fix or maintain your station. It's always ready to charge so you get a good return on your investment.

What Does Assure Include?

Stay on Top of Operations with Proactive Monitoring

- + Find out about problems before your drivers do with remote monitoring
- + Get 98% annual station uptime with a non-performance penalty for outages caused by station hardware or software failures
- + Keep your stations up and running with proactive troubleshooting and dispatch services
- + Fix problems with on-site labor that ChargePoint dispatches and manages
- + Call us during business hours (5 AM – 6 PM Pacific) for expert support

Count On a Fast Fix with One-Business-Day Response Time

- + We respond to all issues within one business day
- + ChargePoint certified technicians will be onsite to repair your station within one business day of receiving any required parts
- + U.S.-based support specialists coordinate all repairs

Rest Easy with the Industry's Leading Parts and Labor Warranty

- + We offer the EV charging industry's first and most comprehensive warranty for parts and on-site labor
- + We cover labor to repair issues that often aren't covered under warranty, such as vandalism, auto accidents and excessive wear and tear

Optimize with Expert Advice and Unlimited Changes

- + U.S.-based EV charging experts advise you on best practices for station configuration and management in your region and industry
- + Our team makes unlimited station configuration and policy changes for you, so you can control access to your station, set charging rates and make adjustments based on driver behavior

Get a Glimpse into Driver Behavior with Robust Reporting

- + See how your stations are being used in an easy-to-read format with monthly summaries
- + Prove success and make improvements with quarterly reports on station utilization, performance, energy usage and environmental impact
- + Compare your station use with organizations like yours

What Does Assure Require?

Because installation quality affects the long-term reliability and availability of EV charging stations, ChargePoint requires that all stations covered by Assure are validated to ensure they meet installation specifications. Validation is performed on-site and includes inspection of power availability, panel, breaker and wiring; confirmation of cellular and local network coverage (through WiFi) and verification that all ChargePoint installation requirements are met. Choose one of the following ways to validate stations and activate Assure:

1. Authorized ChargePoint operations & maintenance (O&M) partners who perform site preparation and station installation will automatically validate the stations and enable Assure.
2. Authorized ChargePoint reseller partners certified to perform self-validation may validate station installations and enable Assure.
3. When independent or in-house installers are used, validation may be purchased from either of the partners above. After the partner successfully validates site preparation and station installation, Assure is enabled.

Station Maintenance Options

Maintenance Option	Parts Only Warranty	Assure
Availability	One year included for free on all stations installed by a ChargePoint certified installer*	Available for purchase for up to five years. Stations must be installed and validated by a ChargePoint certified installer.
Parts Covered	Defective parts are exchanged	Included and coordinated by a ChargePoint support specialist
Certified On-Site Labor	Not included: station owner must find a ChargePoint certified installer to perform any repairs	Included and coordinated by a ChargePoint support specialist
Monthly Station Summary Report		Included
Detailed Quarterly Reports		Included
Uptime Guarantee		98% with non-performance penalty
Proactive Monitoring		Included
Service Level Agreement		1 business day response time 1 business day from parts arrival for on-site labor
Labor Coverage		Included for damage caused by accidents, vandalism and excessive wear and tear
Unlimited Station Configuration		Included

* Installations not performed by a ChargePoint certified installer are not covered under warranty.

Ordering Information

Description	Order Code
Assure for CT4000 Family	CT4000-ASSURE ⁿ
Assure for CPF25	CPF25-ASSURE ⁿ
Assure for Express 100	CPE100-ASSURE ⁿ²
Assure for Express 200	CPE200-ASSURE ⁿ²
Assure for Express 250	EXPRESS-ASSURE ⁿ¹
Assure for Express Plus	EXPRESS-ASSURE ⁿ¹




¹ Substitute *n* for desired years of service (1, 2, 3, 4 or 5 years).

² Substitute *n* for years of service desired (1, 2 or 3 years).

Companion Services

Description	Order Code
Station Activation and Configuration	CPSUPPORT-ACTIVE
Station Installation and Validation	CT4000-INSTALLVALID
Validation	CPSUPPORT-SITEVALID

Contact Us

-  Visit chargepoint.com
-  Call +1.408.705.1992
-  Email sales@chargepoint.com



ChargePoint, Inc.
 240 East Hacienda Avenue
 Campbell, CA 95008-6617 USA

+1.408.841.4500 or
 +1.877.370.3802 US and Canada toll-free
chargepoint.com

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Q10.3: Are CEL&P rate payers paying any costs associated with installing and maintaining the public charging station(s)? If yes, please state the costs and provide the amount paid during the test year. If no, please explain why not.

Response: Please see page 4 of Attachment AJR-2 to the Direct Testimony of Andrew J. Reger, filed on October 23, 2020 in this Cause.

Q10.4: Is any portion of this annual ChargePoint subscription fee included in CEL&P rates? If yes, please state what amount is included in CEL&P's current base rates. If no, please explain why no portion is included in rates.

Response: The current rates were set before the public charging stations were built, and thus the subscription fee is not included in present CEL&P tariffed rates. As explained in the Direct Testimony of Andrew J. Reger (Petitioner's Exhibit 7), Crawfordsville passed a City Ordinance (Attachment DR 10.4) which assesses a \$1 per hour parking fee for the two electric vehicle charging stations.

Q10.5: Is CEL&P proposing to include any electric vehicle charging program costs in its proposed base rates? If yes, please state the costs CEL&P is proposing to include in its proposed base rates.

Response: As discussed in the Direct Testimony of Andrew J. Reger (Petitioner's Exhibit 7), CEL&P is proposing a public electric vehicle energy only rate that is intended to cover all costs associated with providing this service, such that the ChargePoint subscription fee is handled "below the line" and no other rate classes provide any subsidy of this rate.

Ordinance No. 32 —2018

Crawfordsville Common Council

An Ordinance Amending Section 72.13 of Crawfordsville Parking Ordinance and Designating a Rented Parking Space at Trail Head Park in Crawfordsville, Indiana, for CEL&P Electric Vehicle Charging Station

Whereas, the Mayor and Common Council of the City of Crawfordsville, Indiana, have determined that for reasons of traffic and public safety it is necessary to amend Section 73.13 Rented Spaces of the Crawfordsville Parking Ordinance and that there should be a rental parking space designated for Crawfordsville Electric Light & Power's Electric Vehicle Charging Station at Trail Head Park on South Washington Street, Crawfordsville, Indiana.

The Crawfordsville Common Council therefore ordains:

Section 1. Section 72.13 of the Crawfordsville City Code is amended to include the following provision:

- (A) The parking spaces described in Chapter 77, Schedule VII, are designated as "Rented Space." When appropriate signs conforming to the requirements of this Traffic Code are erected no person shall stop, stand or park a vehicle other than the person that has rented the space.
- (B) The annual rental rate(s) to be paid to the city for the rental of parking spaces or renewal of existing rental parking spaces, shall be as follows:
 - (1) Rental of parking space in a metered, street location shall be \$500 per year.
 - (2) Rental of parking space in an off-street 4-hour lot shall be \$400 per year.
 - (3) Rental of parking space in an off-street 12-hour lot shall be \$300 per year.
 - ~~(3)~~(4) Rental of the designated CEL&P Electric Vehicle Charging Station at Trail Head Park shall be \$1.00 per hour, subject to all posted CEL&P charging station rules and regulations.

Section 2. Under City Code Section 72.13, Schedule VII of Chapter 77 of the Crawfordsville Code of Ordinances is amended to add the following parking designations:

Street	Location	Side	Ord. No.	Date Passed
Parking Lot	Two parking spots signed at the CEL&P Electric Vehicle Charging Station	_____	<u>32</u> -2018	<u>12</u> - <u>10</u> -18

Section 3. The Street Commissioner is hereby authorized and directed to install the necessary signage or painting, or both, to effectuate this ordinance, with such markings as Indiana law requires.

Section 4. This ordinance will be in full force and effect immediately upon passage and after any necessary publication. All ordinances or part of ordinances that conflict with this ordinance are hereby repealed.

Adopted and passed this 10 day of December, 2018.



Todd D. Barton, Mayor & Presiding Officer

Attest:



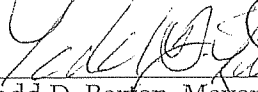
Terri Gadd, City Clerk-Treasurer

Presented to the Mayor of Crawfordsville this 10 day of December, 2018.



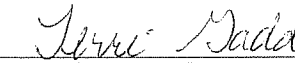
Terri Gadd, City Clerk-Treasurer

This ordinance approved and executed this 10 day of December, 2018.



Todd D. Barton, Mayor

Attest:



Terri Gadd, City Clerk-Treasurer

Q12.1: Please confirm that CEL&P agrees to the following reporting requirements:

EV reports will be filed with the Commission and the OUCC beginning December 31, 2021, and include data for the preceding 12 months and will occur annually thereafter. The following data should be provided:

- (1) The number of customers in CEL&P service territory who drive an EV at the prior to the beginning of the Program, and yearly thereafter;
- (2) Number of customers using the CEL&P-provided public station each day;
- (3) Duration of each charge;
- (4) kWh of each charge;
- (5) Time of day charges occurred (at the very least, off-peak vs. on-peak);
- (6) General location of customer (local or out of state) reasonably discernable by CEL&P; and
- (7) The battery level of the EV prior to charging and the charge level at the conclusion (i.e. was the car empty when it started and full when it left) as is reasonably discernable by CEL&P.

Response: If CEL&P's electric vehicle rate as presented in the Direct Testimony of Andrew Reger (Petitioner's Exhibit #7) is approved by the Commission, and subject to the data availability issues noted below, CEL&P will agree to provide these annual reports with the data indicated above, beginning December 31, 2021. However, CEL&P discloses the following issues that affect its reporting:

- With regard to subpart (1), CEL&P attempted to obtain information regarding the number of existing EV chargers in its territory as part of its due-diligence for the EV project in the third quarter of 2018, but was unsuccessful. Neither the Indiana Bureau of Motor Vehicles, nor local car dealerships could provide this information, and it appears it is not otherwise publicly available.
- With regard to subpart (6), Customer location is often available, but not always, as the Customer's ZIP Code is not required by ChargePoint when setting up an account.
- With regard to subpart (7), battery level data is not currently available from the chargers presently deployed in Crawfordsville.

Should the data in subparts (1), (6) and (7) become available in the future, CEL&P will include this information in its reports.

Q12.2: If CELP does not agree to the reporting requirements listed in question 1 above, please explain why.

Response: Please see Response to Q 12.1 above.

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing *Indiana Office of Utility Consumer Counselor Public's Exhibit No. 5_ Testimony of OUCC Witness Lauren M. Aguilar* has been served upon the following counsel of record in the captioned proceeding by electronic service on December 23, 2020.

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