

STATE OF INDIANA

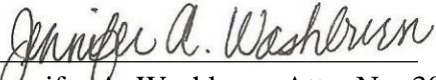
INDIANA UTILITY REGULATORY COMMISSION

INVESTIGATION OF THE INDIANA UTILITY )  
REGULATORY COMMISSION REGARDING THE )  
PUBLIC UTILITY REGULATORY POLICIES ACT )  
SECTION 111(d) STANDARDS AS AMENDED BY )  
THE INFRASTRUCTURE INVESTMENT AND JOBS )  
ACT. RESPONDENTS: NORTHERN INDIANA ) CAUSE NO. 45816  
PUBLIC SERVICE COMPANY; DUKE ENERGY )  
INDIANA, LLC; INDIANA MICHIGAN POWER )  
COMPANY; SOUTHERN INDIANA GAS AND )  
ELECTRIC COMPANY D/B/A CENTERPOINT )  
ENERGY INDIANA SOUTH; INDIANAPOLIS )  
POWER & LIGHT COMPANY D/B/A AES INDIANA; )  
AND ANDERSON MUNICIPAL POWER & LIGHT )

**SUBMISSION OF CAC'S PUBLIC DIRECT TESTIMONY**

Citizens Action Coalition of Indiana, Inc. ("CAC") respectfully submits the Direct Testimony and Attachments of Benjamin Inskeep ("CAC Exhibit 1") in the above-referenced Cause to the Indiana Utility Regulatory Commission.

Respectfully submitted,

  
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**CERTIFICATE OF SERVICE**

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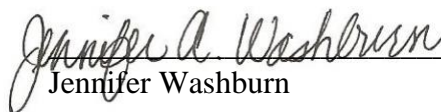
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DIRECT TESTIMONY OF BENJAMIN INSKEEP

ON BEHALF OF

CITIZENS ACTION COALITION OF INDIANA

JUNE 12, 2023

I. INTRODUCTION

1 Q. Please state your name, position and business address.

2 A. My name is Ben Inskeep, and I am the Program Director at Citizens Action Coalition of  
3 Indiana, Inc. (“CAC”). My business address is 1915 West 18<sup>th</sup> Street, Suite C, Indianapolis,  
4 Indiana 46202.

5 Q. Please describe your current responsibilities.

6 A. I have served as CAC’s Program Director since March 2022. In that role, I work to advance  
7 CAC’s policy and programmatic priorities related to energy, utilities, and consumer  
8 affordability and protection.

9 Q. Please briefly summarize your prior employment and educational background.

10 A. I have more than a decade of experience working on energy and utility issues. My prior  
11 employment includes working as a policy analyst at the North Carolina Clean Energy  
12 Technology Center at North Carolina State University (2014-2016), where I co-created and  
13 served as lead author and editor of *The 50 States of Solar*, a quarterly report series tracking  
14 distributed solar policy developments in U.S. states. I also conducted policy research and  
15 contributed to the *Database of State Incentives for Renewables and Efficiency (DSIRE)*  
16 project and provided technical support, analysis, and workshops for state and local  
17 governments through the U.S. Department of Energy’s SunShot Solar Outreach  
18 Partnership.

19 I also worked for EQ Research LLC, a clean energy policy consulting firm, from  
20 2016-2022. I managed EQ Research’s general rate case subscription service, contributed  
21 as a researcher and analyst to other policy service offerings, such as legislative and  
22 regulatory tracking services, and performed customized research and analysis for clients.

1 In addition, my client engagements included participation in state utility regulatory  
2 proceedings, including analyzing utility proposals, drafting and reviewing regulatory  
3 compliance filings, and serving as an expert witness on ratemaking and policy issues.

4 I earned a Bachelor of Science in Psychology with Highest Distinction from Indiana  
5 University in 2009 and both a Master of Science in Environmental Science and a Master  
6 of Public Affairs from the O’Neill School of Public and Environmental Affairs at Indiana  
7 University in 2012. I completed the EUCI’s Utility Accounting 101 course in April 2023.

8 **Q. Have you previously filed testimony before the Indiana Utility Regulatory  
9 Commission (“IURC” or “Commission”)?**

10 **A.** Yes. Attachment BI-1 identifies the cases in which I have previously filed testimony.

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

12 **A.** I am testifying on behalf of CAC.

13 **Q. What is the purpose of your testimony in this proceeding?**

14 **A.** I provide testimony on CAC’s perspective and recommendations to the Commission  
15 regarding its consideration of measures to promote greater electrification of the  
16 transportation sector as referenced in Section 111(d)(21) of the Public Utility Regulatory  
17 Policies Act (“PURPA”), as amended by the Infrastructure Investment and Jobs Act (16  
18 USC § 2621(d)(21)).

19 **Q. Are you sponsoring any attachments to your testimony?**

20 **A.** Yes. I am sponsoring Attachment BI-1: Benjamin Inskeep’s Expert Witness Experience.

**II. Promoting EV Charging While Protecting Consumers**

1 **Q. What amendments did the IIJA make to PURPA with respect to EV charging**  
2 **programs?**

3 **A.** Section 111(d)(21) of PURPA requires, with respect to electric vehicle (“EV”) charging  
4 programs, the Commission consider measures to promote greater electrification of the  
5 transportation sector, including the establishment of rates that:

- 6 • promote affordable and equitable electric vehicle charging options for residential,  
7 commercial, and public electric vehicle charging infrastructure;
- 8 • improve the customer experience associated with electric vehicle charges,  
9 including by reducing charging times for light-, medium-, and heavy-duty vehicles;
- 10 • accelerate third-party investment in electric vehicle charging for the light-,  
11 medium-, and heavy-duty vehicles; and
- 12 • appropriately recover the marginal costs of delivering electricity to electric vehicles  
13 and electric vehicle charging infrastructure.

14 The Commission provided a list of issues through an April 4, 2023, Docket Entry in this  
15 proceeding that identified key items for consideration in this proceeding. The following  
16 sections of my testimony are designed to closely follow the format and issues identified in  
17 that Docket Entry and provide CAC’s perspective on those issues. The scope of my  
18 testimony is limited to the specific items addressed herein, and my silence on any issue  
19 should not be construed as agreement with said issue.

20 **Q. Are there any issues you wish to emphasize for the Commission before responding to**  
21 **the specific issues list identified by the Commission?**

1 A. Yes. I urge the Commission to adopt findings and conclusions in this proceeding regarding  
2 the importance of utilities taking action to address inequities in access to EV charging.  
3 Targeted, intentional strategies and interventions are necessary to ensure that the adoption  
4 of EVs and deployment of EV charging infrastructure will not occur unequally or  
5 inequitably among Indiana communities. Communities that are most impacted by vehicle  
6 emissions today, largely lower-income communities and communities of color living near  
7 highways and transportation corridors, are more likely to be left behind as higher income  
8 communities benefit from available incentives and easier access to financing and  
9 investment.

10 While access to EVs and EV charging is not equally distributed, consumer interest  
11 in adopting EVs is widespread. For instance, a recent study by Consumer Reports that used  
12 a nationally representative sample found that across all racial demographics, overall  
13 interest in purchasing EVs was high. In fact, communities of color showed at least as great  
14 a level of interest in purchasing an electric vehicle as white consumers, with 33% of white,  
15 38% of Black, 43% of Latino, and 52% of Asian Americans saying they would “definitely”  
16 or “seriously consider” purchasing or leasing an EV as their next vehicle.<sup>1</sup>

17 While there is widespread interest in EV adoption among consumers, access to EV  
18 charging is inequitable. Although charging at home is the most affordable way to charge  
19 EVs today, it is not an equally viable option for all communities, particularly where there  
20 is a higher proportion of renters and/or multi-family dwellings. Therefore, I urge utilities

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<sup>1</sup> “Survey Says: Considerable interest in electric vehicles across racial, ethnic demographics,”  
Consumer Reports, September 2022, <https://advocacy.consumerreports.org/wp-content/uploads/2022/09/EV-Demographic-Survey-English-final.pdf>

1 to propose and for the Commission to support tariffs and programs that particularly focus  
2 on addressing the needs of these communities.

**a. Measures to Promote EV Adoption**

3 **Q. Does traditional ratemaking sufficiently promote utility investment in make-ready**  
4 **investments in the promotion of EV adoption?**

5 **A.** My understanding is that make-ready programs require a utility to pay some or all the costs  
6 on the utility side of the meter and in some cases the customer's side of the meter for  
7 interconnecting an EV charging station, and that these costs would then be passed on to the  
8 utility's ratepayers. For example, a utility might pay for service panels, junction boxes,  
9 conduit, wiring, and other components necessary to accommodate an electric vehicle  
10 supply equipment ("EVSE") installation at a specific location.

11 While CAC strongly supports the transition to clean transportation solutions and  
12 views the rapid proliferation of EVs in Indiana as a critical component of this transition,  
13 **CAC has substantial concerns about the potential scope and magnitude of costs of**  
14 **make-ready investments, the potential use of these investments to benefit private**  
15 **businesses rather than low-income communities and communities of color, and the**  
16 **possibility of utilities ratebasing these investments and earning a profit on them,**  
17 **driving electricity bills higher.** For example, utility customers should not be subsidizing  
18 make-ready investments that benefit private businesses who are investing in EVSE to  
19 increase traffic at their businesses for the benefit of the business's shareholders. CAC is  
20 more open to utilities pursuing more targeted and limited make-ready investments to  
21 benefit public schools transitioning to electric school buses, EVSE for public transit (e.g.,



1 bus depots), EVSE located in and designed to benefit low-income communities and  
2 communities of color, and EVSE at affordable multi-family housing.

3 Furthermore, CAC generally opposes the use of non-traditional ratemaking, such  
4 as trackers, for an ever-expanding list of utility spending given the recent history of how  
5 these ratemaking mechanisms have harmed consumers by consistently driving consumer  
6 bills higher. Indiana utility use of trackers over the past decade has resulted in a  
7 “pancaking” of rate increases that has resulted in soaring, unaffordable electricity bills for  
8 many consumers. Indeed, Hoosiers now pay the highest average monthly electricity bills  
9 in the entire Midwest, according to the U.S. Energy Information Administration.<sup>2</sup> CAC  
10 cautions the Commission against open-ended invitations to utilities to use non-traditional  
11 ratemaking, especially to the extent such ratemaking mechanisms have less transparency,  
12 more limited Commission oversight or ability to make amendments to utility proposals  
13 (e.g., allowing cost recovery without demonstrating the investment is used and useful),  
14 accelerated regulatory timetables (i.e., making it harder for interveners to prepare  
15 substantive testimony to aid the Commission in developing an evidentiary record), or  
16 reduced opportunity for public participation (e.g., while rate cases typically include one or  
17 more public hearings, tracker proceedings typically do not).

18 **Q. What non-traditional ratemaking mechanisms might be appropriate to reasonably**  
19 **promote utility investment in make-ready investments?**

20 **A.** While CAC is generally opposed to expanding the use of non-traditional ratemaking  
21 mechanisms absent a more holistic evaluation and overhaul of Indiana’s utility policies,  
22 we believe that reducing or waiving a customer’s contribution for aid in construction could

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<sup>2</sup> U.S. Energy Information Administration, “2021 Average Monthly Bill- Residential,”  
[https://www.eia.gov/electricity/sales\\_revenue\\_price/pdf/table5\\_a.pdf](https://www.eia.gov/electricity/sales_revenue_price/pdf/table5_a.pdf)

1 be warranted in limited situations for select categories of customers to achieve important  
2 public policy goals. For example, EV charging for electric school buses, public transit,  
3 tenants of affordable multi-family housing, and low-income communities and communities  
4 of color are areas where focused utility investment is needed to support public health and  
5 address inequities in access to EV charging, while large business likely does not need  
6 ratepayer subsidization. In other words, there should be some sort of demonstration of  
7 need to receive ratepayer funding to assist with EV buildout.

8 **Q. What, if any, requirements should be in place to ensure utilities have reasonably**  
9 **considered utilizing federal and/or state grant funding opportunities for make-ready**  
10 **investments?**

11 **A.** A utility should be required to explain in its comprehensive transportation electrification  
12 plan (described below), as well as in its case-in-chief requesting Commission approval of  
13 EVSE-related capital investments, which grant funding opportunities it considered, which  
14 it applied for, and which awards it received and did not receive. Ratepayer funding should  
15 be withheld if the utility did not put forth a good faith effort in seeking grant and/or private  
16 funding opportunities. CAC notes that there are many opportunities for funding that  
17 utilities should be actively exploring or partnering with eligible entities. For example, in  
18 addition to the widely known National Electric Vehicle Infrastructure program supporting  
19 high-speed charging on highways, there is also the \$2.5 billion Discretionary Grant  
20 Program for Charging and Fueling Infrastructure reserved for qualifying lower-income  
21 communities that emphasizes Level 2 chargers. Another example is \$5 billion in funding  
22 available over five years under the U.S. Environmental Protection Agency's Clean School  
23 Bus Program. Utilities that fail to make a good faith effort to obtain available funding that

1 could benefit its customers by offsetting costs should be denied cost recovery, at least in  
2 part, of associated EVSE investments from ratepayers.

3 **Q. What, if any, additional jurisdictional opportunities should the Commission**  
4 **consider to promote EV charging adoption?**

5 **A.** As “the crossroads of America,” it is imperative that Indiana engage in comprehensive  
6 transportation electrification planning now to ensure the future economic growth and  
7 prosperity of the State and its residents and businesses. An ad hoc, piecemeal approach by  
8 Indiana’s investor-owned utilities that fails to include robust community and stakeholder  
9 participation and holistically evaluate transportation electrification needs across their  
10 service territories is a recipe for failure. In contrast, Indiana’s successful integrated  
11 resource planning (“IRP”) process has yielded tremendous benefits for ratepayers and  
12 substantial improvements in transparency and utility resource planning, and could serve as  
13 a useful model for successful utility engagement and planning on transportation  
14 electrification that can benefit both the utility (e.g., by improving the design of and  
15 increasing community support for its programs and tariffs) and its customers.

16 CAC therefore urges the Commission to require each investor-owned electric utility  
17 to engage in a public stakeholder collaborative and develop a comprehensive transportation  
18 electrification plan. CAC recommends that each utility’s transportation electrification plan  
19 be updated at least every two years as a balance to keeping the plans relevant but without  
20 creating an undue burden on utilities. There should also be coordination statewide, not just  
21 by utility service territory. A preliminary list of issues that should be addressed in a utility’s  
22 transportation electrification plan includes, but is not limited to:

- 1           • The current adoption of EVs and availability of public EVSE in the utility’s service  
2           territory.
- 3           • A 20-year plan outlining the utility’s EV adoption forecast, the growth in energy  
4           and capacity forecasted to be needed to meet these needs, the extent to which  
5           managed charging and other demand reduction initiatives by the utility could  
6           mitigate EV-related load growth to the benefit of ratepayers, and what  
7           infrastructure investments (transmission, distribution, generation) are needed by  
8           when and at what cost by the utility to meet forecasted consumer EV demand.
- 9           • An assessment of publicly available EVSE in low-income communities and  
10          communities of color in the utility’s service area and the utility’s plan to address  
11          inequities in access to EVSE experienced by these communities.
- 12          • Discussion by the utility of each mechanism being pursued or explored over the  
13          next five years by the utility to facilitate EV charging in its service territory,  
14          including but not limited to dedicated EV charging rates, EVSE rebates, managed  
15          charging programs, make-ready investments, pilot programs, and utility-owned  
16          EVSE.
- 17          • Discussion of federal, state, local, and private (e.g., VW Mitigation Fund) funding  
18          opportunities being pursued by the utility to expand or enable EV charging while  
19          reducing costs to consumers.

20 **Q. Are there any other jurisdictional opportunities the Commission should address?**

21 **A.** Yes. I recommend that the Commission develop clear expectations and rules, as necessary,  
22 that will ensure utilities do not use their monopoly power to undermine market competition  
23 and unfairly compete with non-utility-owned EVSE. These concerns are already arising in

1 Indiana on several fronts. First, several utilities have proposed or already implemented  
2 utility-owned EVSE, with ratepayers paying for some of the capital investment and  
3 operating costs. Second, rates charged at some utility-owned EVSE have been based on a  
4 utility calculation of the average charging rate at allegedly comparable EVSE in the state  
5 or utility service territory, inconsistent with embedded cost-of-service ratemaking that  
6 utilities use for nearly all other rates. Meanwhile, non-utility-owned EVSE providers are  
7 often assessed demand charges that would make EVSE uneconomic to deploy at low  
8 utilization rates, creating an unequal playing field. Third, some utilities have proposed  
9 rebates for EVSE that are more generous if the customer purchases the equipment through  
10 the utility's online marketplace compared to a non-utility provider.

11 Unlike the transmission and distribution of electricity, which clearly exhibits the  
12 characteristics of a natural monopoly, the provision of EVSE is, in general, a competitive  
13 industry, and regulated utilities should therefore play an enabling role rather than as the  
14 main provider of these competitive services and products.<sup>3</sup> **Utilities should not be allowed**  
15 **to use their regulated business entities to unfairly compete with other EVSE**  
16 **providers, such as by leveraging the utility's specialized knowledge of its transmission**  
17 **and distribution grid, accessing confidential information on its customers, using**  
18 **existing regulated utility marketing channels, and using ratepayer funds to subsidize**  
19 **operations or investments**, among other potential unfair advantages it could use to  
20 monopolize the market and keep out competition.

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<sup>3</sup> CAC recognizes that there may be certain situations where private markets are inadequate to ensure fair and equal access to EV charging and that utilities may need to play a larger or different role in helping to address those inequities in these circumstances.

1           One potential model for the Commission to consider in navigating these issues is  
2 the “Code of Conduct” developed by the Michigan Public Service Commission  
3 (“MPSC”),<sup>4</sup> summarized on the MPSC’s website as follows:

4           The Code of Conduct is intended to prevent cross-subsidization, preferential  
5 treatment, and information sharing between a utility’s regulated electric,  
6 steam, or natural gas service and unregulated programs and services,  
7 whether those services are provided by the utility or the utility’s affiliated  
8 entities including alternative electric suppliers. It also provides for the  
9 ability of utilities to offer customers value-added programs and services,  
10 sets the notification and reporting requirements, and allows for MPSC  
11 review of complaints related to violations of these provisions.

12           Ultimately, the goals of applying this in the context of Indiana utilities would be to protect  
13 consumers, avoid electric rate increases on residential customers resulting from  
14 transportation electrification, and foster a competitive and growing EVSE market in  
15 Indiana, while meaningfully addressing inequities in access to EV charging.

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<sup>4</sup> <https://www.michigan.gov/mpsc/regulatory/code-of-conduct#:~:text=The%20Code%20of%20Conduct%20is,the%20utility's%20affiliated%20entities%20including>

**b. Rate Design for End-Use Customers**

1 **Q. What rate structures are needed to promote efficient EV charging?**

2 **A.** For residential customers in single-family homes, **voluntary time-of-use pricing** for EV  
3 charging should be an option for all customers. CAC recommends a simple tariff design  
4 with an on-peak and (significantly lower) off-peak variable charge, a sufficiently long off-  
5 peak time window to allow for a typical EV to charge using a Level 2 charger, and no  
6 additional fixed or demand charge or separate meter requirement. In addition, utilities  
7 should also offer residential customers a **voluntary managed EV charging program**,  
8 where the utility would be allowed to curtail a residential customer's Level 2 charging  
9 during peak events throughout the year in exchange for an incentive provided to the  
10 customer for their participation. Finally, utilities may need to develop special EV charging  
11 rates or incentives for multi-family housing located in low-income communities or  
12 communities of color to address inequities in access to charging experienced by individuals  
13 residing in these communities.

14 Off-peak and managed charging tariffs could also be offered to non-residential  
15 customers. In addition, demand charges under traditional utility rates can create a  
16 substantial barrier for direct current fast chargers ("DCFC"), which often have a very high  
17 demand (e.g., 150 kW compared to only 7 kW for a Level 2 charger), but very low  
18 utilization (e.g., 5%) initially but then increases over time as EV adoption increases. There  
19 are several rate design alternatives that are worthy of exploration to address this significant  
20 barrier to DCFC expansion in Indiana. One potential contender is a rate design developed

1 by the consulting firm RMI in a report it prepared for the Colorado Energy Office.<sup>5</sup> The  
2 RMI tariff concept is to provide lower (discounted) energy and demand charges initially  
3 when utilization of the DCFC is still very low, but then increase these charges over time  
4 on a sliding scale as the utilization rate at the DCFC increases. Importantly, the RMI tariff  
5 was designed to generate the same revenue as the utility would have received under its own  
6 tariff design over a forecasted 10-year period, meaning it is financially sustainable and  
7 would not create a cost shift among consumers in the long-run despite offering discounted  
8 rates initially to incentivize DCFC deployment while EV adoption is still low. CAC is open  
9 to considering and collaborating on creative concepts like this that can help address existing  
10 rate design barriers, while limiting any bill impacts that could burden residential customers  
11 who are already struggling with bill affordability.

12 **Q. What metering infrastructure is required to promote efficient EV charging?**

13 **A.** According to AES Indiana’s direct testimony in Cause No. 45843, many Level 2 EV  
14 charging stations are now capable of measuring detailed EV charging usage, rendering  
15 obsolete the need for the utility to install a separate meter to measure EV charging for  
16 purposes of a utility administering an EV charging tariff or program. AES Indiana’s  
17 testimony went on to detail the substantial downsides of requiring separately metered EV  
18 charging stations at residential premises, including the additional expense to residential  
19 customers.

20 Accordingly, CAC recommends that, to the maximum extent possible, utilities  
21 utilize the capabilities of modern EV charging stations to measure usage rather than

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<sup>5</sup> “DCFC RATE DESIGN STUDY,” RMI, February 2020, <https://rmi.org/insight/dcfc-rate-design-study/>



1 requiring residential customers install separate metering to participate in EV charging  
2 tariffs or programs.

3 **Q. What are the appropriate allocation considerations of direct and indirect rate class**  
4 **specific costs and benefits for EV-adoption-supportive rate designs?**

5 **A.** CAC is concerned that residential ratepayers have been and will be asked to subsidize EV  
6 programs or supportive rate designs designed for non-residential customers. For example,  
7 in Cause No. 45843, I highlighted in my direct testimony that AES Indiana is proposing to  
8 spend only 11% of its EV Portfolio program budget on residential customers, yet they  
9 proposed a cost allocation that would require residential customers pay for 42% of the  
10 costs. The Commission should ensure that a utility's transportation electrification tariffs  
11 and programs do not shift non-residential customer costs onto residential customers.

12 In addition, voluntary time-of-use or managed charging rates for residential  
13 customers should be designed to incentivize residential customers to reduce charging  
14 during peak time periods when the residential customer class is assigned costs under  
15 current cost allocation methodologies. For example, a utility that still uses a 4CP (four  
16 coincident peak) production cost allocator should design EV tariffs and programs for  
17 residential customers that incentivize customers to reduce EV charging during the peaks of  
18 each of the four months in which the residential class would be assigned cost allocation.  
19 Otherwise, residential EV charging could result in the residential customer class being  
20 assigned a high proportion of legacy (embedded) costs in a utility's class cost of service  
21 study in its subsequent rate case. In other words, it might not enough for a utility to design  
22 a EV tariff or program to reduce its total peak demand if the utility is in practice allocating  
23 costs to customer classes based on customer class usage during other times.

1 **Q. What are the potential asset life impacts of changing behind-the-meter technology**  
2 **and how should EV-adoption-supportive rate design address them?**

3 **A.** The best way to avoid negative impacts related to asset life of changing behind-the-meter  
4 technology is for utilities to generally avoid owning behind-the-meter technologies such as  
5 EVSE. Instead, utilities should generally be focused on integrated distribution planning,  
6 IRP processes that plan for securing adequate resources to meet continued growth of  
7 transportation electrification, and offering rates and programs to customers to help them  
8 adopt these technologies and shift their usage. EV-adoption-supportive rate design should  
9 generally be sustainable over the long term in terms of collecting sufficient revenue to  
10 offset costs caused by the customer, after taking into full consideration all of the associated  
11 benefits.

12 As noted above, there are some limited exceptions to this general rule that could be  
13 worthwhile for helping to achieve important public policy goals, such as addressing  
14 inequities in access to EV charging. In those circumstances, comprehensive and transparent  
15 utility transportation electrification planning and stakeholder engagement are paramount  
16 for developing sound programs.

**c. Rate Design for Intermediary Customers**

1 **Q. Should the Commission allow specific rate designs that are designed to support**  
2 **intermediary customer business models that may diverge from cost-of-service**  
3 **principles?**

4 **A.** Traditional embedded cost-of-service principles continue to be an important consideration  
5 in rate design. In general, utility customers should not be subsidizing through rate design  
6 or cost allocation private EVSE businesses served by the utility, including non-utility  
7 EVSE providers. That said, and as described in the previous section, there are opportunities  
8 for utilities to modify current rate design to better enable the expansion of EVSE, which  
9 could benefit intermediary customer business models, while protecting other customers  
10 from cross-subsidization over the long term. There are also opportunities for EVSE to  
11 provide demand response services, for which they should receive fair compensation, as  
12 well as terms and conditions of participation.

13 **Q. How, if at all, should the Commission consider rate designs for the utility when the**  
14 **utility might serve as the intermediary customer?**

15 **A.** In general, utilities should not be serving as the intermediary customer. As previously  
16 noted, these services are outside of the domain of regulated monopoly utility service, so  
17 utilities wishing to expand their business into this segment should establish separate  
18 affiliate unregulated entities and should “firewall” their utility business from such affiliate  
19 entities.

20 In the limited circumstances where there is a compelling public policy need for the  
21 utility to serve as the intermediary customer, there will likely be important reasons for  
22 offering discounted rates or additional incentives to achieve those public policy goals.

1 Comprehensive utility planning of transportation electrification will help ensure such rates  
2 and programs are appropriately designed and tailored.

### III. CONCLUSION

3 **Q. What are your recommendations?**

4 **A.** I recommend that the Commission direct each investor-owned electric utility to engage in  
5 a public stakeholder collaborative on designing transportation electrification rates and  
6 programs. I recommend that the Commission direct each investor-owned utility to file a  
7 comprehensive transportation electrification plan with the Commission that takes into  
8 consideration stakeholder feedback provided in the collaborative no later than December  
9 31, 2024, and to update and file a transportation electrification plan at least every two years  
10 thereafter.

11 When considering utility proposals related to transportation electrification, I urge  
12 the Commission to place a strong emphasis on residential customer bill affordability,  
13 meaningfully addressing inequities in access to EV charging in low-income communities  
14 and communities of color, and removing barriers to EVSE deployment.

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

16 **A.** Yes.

**VERIFICATION**

I, Ben Inskeep, affirm under penalties of perjury that the foregoing representations are true and correct to the best of my knowledge, information and belief.

Ben Inskeep  
Ben Inskeep

June 12, 2023

**Attachment BI-1: Benjamin Inskeep's Expert Witness Experience****Indiana Utility Regulatory Commission**

<b>Cause No.</b>	<b>Case Description</b>
38703 FAC 133-S1	AES Indiana Eagle Valley Outage
45504	AES Indiana Excess Distributed Generation Tariff
45505	NIPSCO Excess Distributed Generation Tariff
45506	I&M Excess Distributed Generation Tariff
45508	Duke Energy Indiana Excess Distributed Generation Tariff
45700	NIPSCO Michigan City Coal Ash Compliance Project
45701	I&M Demand-Side Management Plan 2023-2025
45722	CenterPoint Securitization of AB Brown
45740	Duke Energy Indiana and International Paper Special Contract
45749	Duke Energy Indiana Coal Ash Compliance Project
45772	NIPSCO Electric Rate Case
45775	Duke Energy Indiana Low-Income Consumer Protections
45795	CenterPoint Culley East Coal Ash Compliance Project
45797	NIPSCO Schahfer Coal Ash Compliance Project
45803	Duke Energy Indiana Demand-Side Management Plan 2024-2026
45836	CenterPoint Wind Project CPCN
45843	AES Indiana EV Portfolio
45868	I&M's Solar Projects CPCN

**Kentucky Public Service Commission**

<b>Case No.</b>	<b>Case Description</b>
2020-00174	Kentucky Power's 2020 Rate Case
2020-00349	Kentucky Utilities' 2020 Rate Case
2020-00350	Louisville Gas & Electric's 2020 Rate Case