



May 25, 2018

*Kendall R. Buchanan
Deputy Director, Division of Market and Consumer Services
South Carolina Department of Insurance
1201 Main Street, Suite 1000
Columbia, SC 29201*

RE: SC Draft Beneficiary Mitigation Plan – VW Settlement Agreement

Dear Ms. Buchanan:

On behalf of the Office of Regulatory Staff - Energy Office, Palmetto Clean Fuels (PCF) coalition, and a working group of utility transportation officials, we appreciate your willingness to consider allocating the full 15% allowable by the settlement for light-duty zero emission vehicle supply equipment.

PCF is South Carolina's designated US Department of Energy Clean Cities coalition.¹ It is a voluntary partnership of alternative fuel manufacturers, distributors, and supporters who collectively work together to increase the adoption of alternative fuels and advanced vehicle technologies. PCF strives to help public and private entities -- as well as individuals -- lower fuel costs, improve air quality, and reduce petroleum consumption.

PCF proposed the strategic deployment of level 2 and DC fast-charging electric vehicle supply equipment (EVSE) at strategic locations, aimed at supporting tourism and economic development throughout South Carolina. Since submitting our initial proposal, PCF has continued discussions with key stakeholders to include multiple ongoing efforts.

PCF recognizes the pivotal role that the investor-owned utilities, public power utility, and electric cooperatives play in South Carolina and the expertise they offer. Consequently, PCF sought the insight of representatives from each of these groups, many of whom are already working with Electrify America on their deployment efforts. These discussions are ongoing and will continue to address important issues related to possible EVSE investments such as site selection, construction, ownership, operation and maintenance, development of incentive programs, and utility rate structures. It is essential to collaborate with utility stakeholders as investment plans are pursued to maximize the efficiency and success of deployments.

¹ <https://cleancities.energy.gov/>

This working group recognizes the importance of EVSE investments to eliminate gaps in current infrastructure across a spectrum of applications: along major corridors, such as rest areas and welcome centers; highly-trafficked and/or visible locations, such as shopping malls and major employers; strategically located state-fleet fueling sites; multi-tenant office complexes; and multi-family dwellings, such as condominiums and apartments.

Given the recent trends in EV adoption,² we applaud your decision to support economic development in SC by investing in EVSE. It has become clear during our discussions that EVSE cannot be installed without the active engagement of the appropriate utility. We would appreciate the opportunity to share our experience, offer our expertise, and assist your office in developing/administering a program to deploy these funds in South Carolina. If you have any questions, please contact us. We look forward to the possibility of working with you on this important endeavor.

Sincerely,



Maeve S.R. Mason
Co-Coordinator
Palmetto Clean Fuels
SC Energy Office



Landon Masters
Co-Coordinator
Palmetto Clean Fuels
SC Energy Office



Jim Rabon
Manager, Conservation and Energy Efficiency
Santee Cooper



Westy Westmoreland
General Manager, Utility Services Support
SCE&G



Lang Reynolds
Manager, Electric Transportation
Duke Energy



Mike Smith
VP, Business and Technology Strategy
Electric Cooperatives of South Carolina



Bryan Stone
Chief Operating Officer
Lockhart Power



Cole Price
VP, Member Services
Central Electric Power Cooperative, Inc.

² EV Outlook 2017, by Bloomberg New Energy Finance group.