BEFORE THE
PUBLIC SERVICE COMMISSION
OF MARYLAND

IN THE MATTER OF THE PETITION OF THE ELECTRIC VEHICLE WORK GROUP FOR IMPLEMENTATION OF A STATEWIDE ELECTRIC VEHICLE PORTFOLIO

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PROPOSAL OF BALTIMORE GAS AND ELECTRIC COMPANY, DELMARVA POWER & LIGHT COMPANY, AND POTOMAC ELECTRIC POWER COMPANY FOR REVISED TARIFFS REGARDING IMPLEMENTATION OF APPROVED ELECTRIC VEHICLE CHARGING PROGRAM OFFERINGS

Baltimore Gas and Electric Company (“BGE”), Delmarva Power & Light Company (“Delmarva”), and Potomac Electric Power Company (“Pepco”) (collectively the “Exelon Joint Utilities”), hereby submit to the Maryland Public Service Commission (the “Commission”) for review and approval proposed revised tariffs associated with certain program offerings previously approved by the Commission in the above-captioned matter. Through this filing, the Exelon Joint Utilities propose revised tariffs to include revised Direct Current Fast Charge (“DCFC”) electric vehicle charging rates for any multi-vehicle (“MV”) user operating at least five (5) electric vehicles (“EVs”) in one or more of the electric distribution service territories of the Exelon Joint Utilities (the “MV Charging Rates”). The MV Charging Rates will encourage MV operators to increase the number of EVs owned and operated in Maryland. In addition, this filing details plans for participation by the Exelon Joint Utilities in an innovative rideshare program that will offer an opportunity to leverage ridesharing by siting EV charging infrastructure and creating EV utilization and transportation equity opportunities for customers in limited- and moderate-income
(“LMI”) communities while employing ridesharing as a tool to increase education arounds EVs in all communities. The Exelon Joint Utilities respectfully request that the Commission approve the MV Charging Rates on or before December 31, 2019 so that the tariffs have an effective date of January 1, 2020.

I. INTRODUCTION

In Order No. 88997, the Commission approved in part, and denied in part, the “Statewide Electric Vehicle Portfolio” proposal that was filed in January 2018. In reaching its decision in Order No. 88997, the Commission appropriately balanced efforts to limit costs and bill impacts while at the same time better positioning Maryland to meet its goal of having 300,000 zero-emission electric vehicles (“ZEVs”) on Maryland roadways by 2025, all in support of Maryland’s Greenhouse Gas Reduction Act (“GGRA”). At its June 19, 2019 Administrative Meeting, the Commission subsequently considered the Exelon Joint Utilities’ April 19, 2019 compliance filing regarding implementation of Order No. 88997 and accepted the proposed tariff pages (“Public Charging Tariffs”) therein with an effective date of July 1, 2019.

In Order No. 88997, with respect to EV chargers in utilities’ public charging EV networks, the Commission urged the Exelon Joint Utilities to maintain an equitable distribution of such chargers across their respective service territories, highlighting the Maryland Energy Administration’s recommendation that EV charging infrastructure “investments should be made in underserved locations or areas unable to attract private capital.”1 One such significant category of underserved locations is that of LMI communities within the Exelon Joint Utilities’ service territory.

1 Order No. 88997 at p.64 (quoting MEA).
In order to better ensure that public EV chargers sited in LMI communities are better utilized in ways that those communities engage with the transportation market today, and therefore better include those residents in the transportation electrification movement, the Exelon Joint Utilities have identified and developed a proposed program (the “Rideshare Program”) to work with Lyft, Inc. (“Lyft”) and potentially other rideshare companies operating in the Exelon Joint Utilities’ service territories in both LMI and non-LMI communities. In part to enable the Rideshare Program, the Exelon Joint Utilities propose the MV Charging Rates, supporting introduction of up to 100 EVs into Lyft’s Express Drive platform, which allows drivers to lease EVs for use in offering rides in Lyft’s network, as well as EVs in other rideshare, business, government and institutional customers’ vehicle operations.

In Section II below, the Exelon Joint Utilities describe the MV Charging Rates. Section III overviews the proposed Rideshare Program, and Section IV describes how the Rideshare Program will create enhanced and more equitable access to benefits from transportation electrification. Section V describes the Exelon Joint Utilities’ plans for incorporating the Rideshare Program’s impacts into the evaluation, measurement, and verification (“EM&V”) of overall EVsmart Portfolio results.

II. PROPOSED REVISIONS TO PUBLIC CHARGING TARIFFS

The Exelon Joint Utilities propose the following addition to the Public Charging Tariffs:

Upon Company verification and account registration, a user operating within the Company’s electric distribution service territory five (5) or more EVs titled and registered with the Maryland Department of Transportation Motor Vehicle Administration is eligible for a DCFC Charging Station Multi-Vehicle rate equal to 75 percent of the above published standard DCFC Charging Station Standard rate.
The proposed MV Charging Rates, like the existing DCFC Charging Station Standard rate, are non-discriminatory, are commensurate with higher utilization by MV operators, and fall within the range of market-based rates surveyed by the Exelon Joint Utilities as recently as July 2019.2 The MV Charging Rates should yield additional EV charging sessions by encouraging EV adoption by MV operators and additional kilowatt-hours delivered for each unique charging session, enhancing overall EVsmart Portfolio benefits and cost-effectiveness for ratepayers. The Exelon Joint Utilities in setting the level of the MV Charging Rates, which will be reviewed semi-annually as noted below, considered an appropriate rate that provided enough incentive to encourage MV operator electrification, but not too low as to put undue pressure on other charging network market participants, yet high enough to maintain appropriate recovery to help offset public EV charging program costs. In this way, these enhancements create more economical, though still market-based, EV charging rates to support increased EV adoption in the Exelon Joint Utilities’ service territories. As with the existing standard public charging EV rate, the MV Charging Rates will be reviewed semi-annually and are subject to change with Commission approval.

Please find attached as Exhibit A both red-lined and clean copies of tariff pages containing the proposed MV Charging Rates for the Exelon Joint Utilities.

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III. PARTICIPATION IN INNOVATIVE RIDESHARE PROGRAM

Lyft currently offers its innovative Express Drive platform in markets around the country, through which potential drivers – who either do not own or do not wish to utilize a personal vehicle for ridesharing – may lease a vehicle through Lyft’s program on a weekly basis to provide rideshares to passengers in the Lyft network.\(^3\) Earlier this year, in two markets – Seattle, Washington, and Atlanta, Georgia – Lyft introduced EVs into its Express Drive platform to demonstrate EV benefits for drivers and riders, noting that “EVs hold the promise of making cities more livable by dramatically reducing air pollution.”\(^4\)

Whereas EVsmart public EV charging infrastructure sited in LMI communities is necessary and appropriate for equitable distribution of utilities’ public network infrastructure, without creative action around utilization strategies, such infrastructure may see more limited use and provide more limited benefits to the LMI communities than benefits that are available to host EV chargers, or overall EV portfolio benefits for all customers. Indeed, EVs and car ownership more broadly continue to be less accessible to LMI customers. The Exelon Joint Utilities propose that through participation in the Rideshare Program, coupling the proposed MV Charging Rates with EVsmart charging infrastructure located in part in LMI communities will provide convenient, accessible charging for multi-vehicle operators’ EVs, supporting rideshare and other commercial customers’ consideration of EVs, including an initial release by Lyft of up to 100 EVs into the Exelon Joint Utilities’ Maryland service territories. Although the Rideshare Program will be offered throughout the entire service area, the Exelon Joint Utilities propose to emphasize a

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3 See https://www.lyft.com/expressdrive.
customer education program focused on LMI communities to increase utilization of the Rideshare Program in LMI communities and provide more equitable benefits to LMI customers as detailed below.

Please find attached as Exhibit B letters from Greenlots, the United Way of Central Maryland, the American Lung Association, Baltimore City, and the Rebuild Johnston Square Partnership in support of the Exelon Joint Utilities’ participation in the innovative Rideshare Program.

IV. RIDESHARE PROGRAM BENEFITS

A. Community Development

The Rideshare Program will promote community development in LMI neighborhoods in several ways, including the following:

• The Exelon Joint Utilities intend to work with Lyft to hold driver recruitment events in neighborhoods where EVsmart public EV charging infrastructure will be located, creating an immediate opportunity for supplemental or primary income for local drivers and an opportunity to educate these prospective drivers about the benefits of driving an EV, in particular.

• Rideshare EVs can provide more convenient and affordable point-to-point transportation to/from job opportunities around the region.⁵

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⁵ See, e.g., www.unitedway.org/our-impact/featured-programs/2-1-1/ride-united (stating that “[a]cross the United States, a lack of reliable, safe, convenient transportation hinders hundreds of thousands of peoples’ abilities to get to good jobs, access healthcare, seek healthy food, apply for public benefits and more.”).
B. Transportation Access

The Rideshare Program will have particular focus on addressing transportation access for LMI neighborhoods, while providing a platform through which customers who reside in these neighborhoods can equitably participate in Maryland’s transportation electrification. For instance:

- Having EVs in the Rideshare Program charging in these LMI neighborhoods will increase the number of close-in-proximity Lyft drivers when a rider in these communities seeks a pickup through the Lyft App, or through similar rideshare platforms that include EV drivers.
- The Exelon Joint Utilities plan to work with local institutions, businesses, and non-governmental organizations to create and contribute to rideshare access programs that may focus on demonstrating potential solutions for transportation challenges in areas with limited access to healthcare, food, education, and occupation options.6

C. Accelerated EV Adoption and Environmental Impacts

In addition to simply enabling at least 100 new full battery EVs to be introduced into Maryland, the fact that these vehicles will be used for rideshares is likely to result in a significantly higher impact than 100 or more personal use EVs may have in meeting Maryland’s ZEV and GGRA goals. For example:

6 See, e.g., Lyft partnership with Martha’s Table to tackle food desert challenges in Anacostia in Washington, D.C. (www.lyftgroceryaccess.com); see also link between Lyft, General Motors and United Way to offer 2-1-1 transportation access in 25 cities (www.unitedway.org/ride-united); see also Lyft “Round Up & Donate” program through which Lyft may “round up your fares to the nearest dollar, then donate the difference to a charitable cause” (www.lyft.com/round-up/causes).
• Rideshare vehicles typically drive three to five times more miles annually than personal use vehicles, making one rideshare EV roughly the equivalent of converting three to five personal use internal combustion engine vehicles.

• In a recent report from the National Center for Sustainable Transportation associated with the University of California, Davis, researchers examined benefits from electrifying rideshare vehicles, finding that “emissions benefits of electrifying a vehicle in a [rideshare] fleet are nearly three times greater than the benefits from electrifying a privately-owned vehicle,”7 pointing out specifically 2018 data indicating that “[w]hile these [rideshare] vehicles represent less than 0.5% of the electric vehicles in California, the charging demand from this service is 30% of the total energy demand for the remaining electric vehicles . . . .”8 In this way, rideshare vehicles are converting emissions miles more quickly and frequently than personal use vehicles. By working to focus these efforts on LMI communities in our dense, urban environments, moreover, the EVsmart program will better improve air quality in areas that are more keenly susceptible to health and environmental effects of transportation GHG emissions.

• Each passenger pickup in an EV rideshare effectively serves as a “Ride & Drive” experience, a very successful way to expose individuals to EVs and promote adoption. EVs in Lyft’s Express Drive platform, for example, are required to accept at least 20 rides per week,9 so 100 EVs would likely result in over 2,000 “Ride & Drives” per week, and over 100,000 per year.

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8 National Center for Sustainable Transportation Report at p.7.

9 See www.lyft.com/expressdrive at FAQs (indicating renters must provide “at least 20 rides every seven days”).
The result is an in-person, live education on EVs for over 100,000 individuals per year, understanding that ride shares can involve multiple passengers traveling together.

- A program with ride share companies in the Baltimore-Washington region may garner greater media attention than similar programs launched in Seattle and Atlanta, resulting in substantial local exposure through a variety of media channels, all of which creates increased focus on Maryland’s ZEV goals, as well as more awareness of transportation equity challenges that exist in the region. Additionally, Washington state and Georgia have not supported EVs through statewide goals as strong as Maryland’s goals, potentially making EV ride share programs in Maryland more attractive, impactful, and visible for the region.

- The Exelon Joint Utilities plan to encourage passengers to learn more about EVsmart programs and incentives, potentially through window stickers and informational materials available in ride share EVs.

- As the MV Charging Rates will apply in a non-discriminatory manner to any registered user operating five (5) or more EVs, they may also promote increased vehicle electrification by a variety of potential government, institutional, and business fleet operators.

D. Accelerated Learnings

In Order No. 88997, the Commission specifically stated in support of its approvals the importance of learnings regarding “potential impacts and implications for the electric distribution grid, including reliability, load management, improved system efficiency . . . .” The Exelon Joint Utilities expect to work to collect and review data from EVs in the Rideshare Program related to

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10 Order No. 88997 at p.37.
their driving and charging patterns, information which will accelerate learnings around preparing
the grid for widespread EV adoption, and potentially create a platform for demonstrating and
evaluating strategies for managing EV impacts.

V. RIDESHARE PROGRAM IMPACTS

The Joint Utilities estimate that, as an enhancement to their overall EVsmart Portfolios, the
Rideshare Program may increase overall EVsmart Portfolio costs by up to $500,000 in total among
the Exelon Joint Utilities. Preliminary review of impacts suggests that the Rideshare Program will
support strong benefits to ratepayers as part of the overall EVsmart Portfolios. The Exelon Joint
Utilities commit to providing all such costs for the Rideshare Program to an independent EM&V
contractor for inclusion in the overall EVsmart Portfolios’ EM&V reports that the Exelon Joint
Utilities will subsequently file in the Case No. 9478 docket, which reports and costs will be subject
to the Commission’s review.

VI. CONCLUSION

The Exelon Joint Utilities respectfully request that the Commission approve the MV
Charging Rates on or before December 31, 2019, so that the tariffs have an effective date of
January 1, 2019.

Respectfully submitted,

Daniel W. Hurson
Assistant General Counsel
Baltimore Gas and Electric Company, on
behalf of the Exelon Joint Utilities

November 18, 2019
EXHIBIT A

(BGE Redlined and Clean Tariff Pages)
UTILITY OWNED ELECTRIC VEHICLE PUBLIC CHARGING

SCHEDULE EVP

Availability: The Company shall own and operate electric vehicle (EV) Level 2 (L2) and Direct Current Fast Charge (DCFC) charging stations available for public use in accordance with Commission Order No. 88997 in Case No. 9478. All EV chargers would be sited on property either owned by government entities or government-associated organizations, or controlled by those entities and organizations (such as through easements, right-of-ways, or similar legal or equitable mechanisms). The chargers must be accessible to the public for charging at all times. The chargers and the charger site must be accessible to the Company at all times, including accessibility for installing the chargers, maintaining the chargers, or performing any work on the chargers. L2 charging stations shall cover all applications at 208/220/240 voltage levels with demand loads ranging from approximately 3 to 13 kW. DCFC charging stations cover applications with demand loads from approximately 50 to 150 kW.

To use the chargers, a user chooses to charge their EV at a Company-owned charging station. The user must register an account with the Company’s network provider, including payment information, prior to using the charger. Upon Company verification and account registration, a user operating within the Company’s electric distribution territory 5 or more EVs titled and registered with the Maryland Department of Transportation Motor Vehicle Administration is eligible for a DCFC Charging Station Multi-Vehicle rate equal to 75 percent of the DCFC Charging Station Standard rate. Applicable charging rates are shown below, and are subject to change periodically with Commission approval.

Schedule EVP is provided in conjunction with a contract for service under Schedules G or GL (the Controlling Schedule). Controlling Schedule provisions apply, including applicable Riders, unless they are specifically altered herein.

Charging Rates:

<table>
<thead>
<tr>
<th>Level 2 Charging Station:</th>
<th>0.18 $/kWh</th>
</tr>
</thead>
<tbody>
<tr>
<td>DCFC Charging Station Standard Rate:</td>
<td>-0.34 $/kWh</td>
</tr>
<tr>
<td>DCFC Charging Station Multi-Vehicle Rate:</td>
<td>0.255 $/kWh</td>
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Payment Terms: Users who charge their vehicle at a Company-owned station are subject to the payment terms of the Company’s network provider.
UTILITY OWNED ELECTRIC VEHICLE PUBLIC CHARGING

SCHEDULE EVP

Availability: The Company shall own and operate electric vehicle (EV) Level 2 (L2) and Direct Current Fast Charge (DCFC) charging stations available for public use in accordance with Commission Order No. 88997 in Case No. 9478. All EV chargers would be sited on property either owned by government entities or government-associated organizations, or controlled by those entities and organizations (such as through easements, right-of-ways, or similar legal or equitable mechanisms). The chargers must be accessible to the public for charging at all times. The chargers and the charger site must be accessible to the Company at all times, including accessibility for installing the chargers, maintaining the chargers, or performing any work on the chargers. L2 charging stations shall cover all applications at 208/220/240 voltage levels with demand loads ranging from approximately 3 to 13 kW. DCFC charging stations cover applications with demand loads from approximately 50 to 150 kW.

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Schedule EVP is provided in conjunction with a contract for service under Schedules G or GL (the Controlling Schedule). Controlling Schedule provisions apply, including applicable Riders, unless they are specifically altered herein.

Charging Rates:
- Level 2 Charging Station: 0.18 $/kWh
- DCFC Charging Station Standard Rate: 0.34 $/kWh
- DCFC Charging Station Multi-Vehicle Rate: 0.255 $/kWh

Payment Terms: Users who charge their vehicle at a Company-owned station are subject to the payment terms of the Company’s network provider.
EXHIBIT A

(PEPCO Redlined and Clean Tariff Pages)
PUBLIC ELECTRIC VEHICLE CHARGING SERVICE
SCHEDULE “PC-PIV”

AVAILABILITY – Available only for the purpose of Plug-in Vehicle (“PIV”) battery charging from Company-operated Level 2 (L2) and Direct Current Fast Charging (DCFC) public electric vehicle (EV) charging stations. All public EV charging stations will be sited on property either owned by government entities or government-associated organizations or controlled by those entities and organizations (such as through easements, right-of-ways, or similar legal or equitable mechanisms). L2 charging stations shall cover applications with demand loads up to 19.2 kW. DCFC charging stations cover applications with demand loads greater than 19.2 kW.

The service provided under Schedule “PC-PIV” allows EV operators to charge their EV at a Company-owned public charging station. EV operators who reside either within the Company’s service territory or outside the Company’s service territory are eligible to charge their EV at a Company-owned station.

CHARGING RATE FOR EV OPERATOR
Charges under Schedule “PC-PIV” will be administered and billed through the Company’s third-party vendor (Network Provider) on behalf of the Company. Information on opening an account with the Company’s Network Provider is available on the Company’s website. EV operators that charge their vehicle at a Company-owned station are subject to the payment terms of the Company’s Network Provider.

Any EV operator using Company-operated public EV charging stations for the purpose of PIV battery charging shall pay for such service at the rates listed below. Upon Company verification and account registration, a user operating within the Company's electric distribution territory 5 or more EVs titled and registered with the Maryland Department of Transportation Motor Vehicle Administration is eligible for a DCFC Charging Stations Multi-Vehicle rate equal to 75 percent of the DCFC Charging Stations Standard rate. These rates are subject to change periodically, subject to Commission approval.

L2 Charging Stations: $0.18 per kwhr
DCFC Charging Stations Standard Rate: $0.34 per kwhr
DCFC Charging Stations Multi-Vehicle Rate: $0.255 per kwhr

Schedule “PC-PIV” is provided in conjunction with the contract for service under the applicable Rate Schedule (the Controlling Rate Schedule), as determined by the availability of each Rate Schedule. Controlling Schedule provisions apply, unless they are specifically altered herein.

APPLICABLE RIDERS
The applicable Riders for Schedule “PC-PIV” are determined by the Controlling Rate Schedule, unless they are specifically altered herein.

Rider “Green” provides 100% renewable energy on a mandatory basis to the Controlling Rate Schedules associated with Schedule “PC-PIV.”
CONDITIONS

1. Schedule “PC-PIV” is designed for retail charging service to EV operators at Company-owned public charging stations. Customer-owned EV chargers are not eligible for service under Schedule “PC-PIV.”
2. The Charging Rate pricing provided in this tariff is part of a pilot program and is subject to change.
3. Additional fees may apply based on siting location.
4. Operation, repair and maintenance of electric vehicle charging stations on this rate schedule will be the responsibility of the Company.
5. The Company may at its discretion install, relocate, modify, or remove electric vehicle charging stations. Potential modifications to Company operated electric vehicle charging stations may include adding, removing, or changing electric vehicle supply equipment available for charging service. The chargers and the charger site must be accessible to the company at all times, including accessibility for installing the chargers, maintaining the chargers, or performing any work on the chargers.
6. The charger must be accessible to the public for charging at all times.

GENERAL TERMS AND CONDITION
This schedule is subject in all respects to the Company’s “General Terms and Conditions for Furnishing Electric Service” and the Company’s “Electric Service Rules and Regulations.”
PUBLIC ELECTRIC VEHICLE CHARGING SERVICE
SCHEDULE “PC-PIV”

AVAILABILITY – Available only for the purpose of Plug-in Vehicle (“PIV”) battery charging from Company-operated Level 2 (L2) and Direct Current Fast Charging (DCFC) public electric vehicle (EV) charging stations. All public EV charging stations will be sited on property either owned by government entities or government-associated organizations or controlled by those entities and organizations (such as through easements, right-of-ways, or similar legal or equitable mechanisms). L2 charging stations shall cover applications with demand loads up to 19.2 kW. DCFC charging stations cover applications with demand loads greater than 19.2 kW.

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CHARGING RATE FOR EV OPERATOR
Charges under Schedule “PC-PIV” will be administered and billed through the Company’s third-party vendor (Network Provider) on behalf of the Company. Information on opening an account with the Company’s Network Provider is available on the Company’s website. EV operators that charge their vehicle at a Company-owned station are subject to the payment terms of the Company’s Network Provider.

Any EV operator using Company-operated public EV charging stations for the purpose of PIV battery charging shall pay for such service at the rates listed below. Upon Company verification and account registration, a user operating within the Company’s electric distribution territory 5 or more EVs titled and registered with the Maryland Department of Transportation Motor Vehicle Administration is eligible for a DCFC Charging Stations Multi-Vehicle rate equal to 75 percent of the DCFC Charging Stations Standard rate. These rates are subject to change periodically, subject to Commission approval.

<table>
<thead>
<tr>
<th>Charging Station Type</th>
<th>Rate</th>
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<tbody>
<tr>
<td>L2 Charging Stations</td>
<td>$0.18 per kWhr</td>
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</table>

Schedule “PC-PIV” is provided in conjunction with the contract for service under the applicable Rate Schedule (the Controlling Rate Schedule), as determined by the availability of each Rate Schedule. Controlling Schedule provisions apply, unless they are specifically altered herein.

APPLICABLE RIDERS
The applicable Riders for Schedule “PC-PIV” are determined by the Controlling Rate Schedule, unless they are specifically altered herein.

Rider “Green” provides 100% renewable energy on a mandatory basis to the Controlling Rate Schedules associated with Schedule “PC-PIV.”
CONDITIONS

1. Schedule “PC-PIV” is designed for retail charging service to EV operators at Company-owned public charging stations. Customer-owned EV chargers are not eligible for service under Schedule “PC-PIV.”
2. The Charging Rate pricing provided in this tariff is part of a pilot program and is subject to change.
3. Additional fees may apply based on siting location.
4. Operation, repair and maintenance of electric vehicle charging stations on this rate schedule will be the responsibility of the Company.
5. The Company may at its discretion install, relocate, modify, or remove electric vehicle charging stations. Potential modifications to Company operated electric vehicle charging stations may include adding, removing, or changing electric vehicle supply equipment available for charging service. The chargers and the charger site must be accessible to the company at all times, including accessibility for installing the chargers, maintaining the chargers, or performing any work on the chargers.
6. The charger must be accessible to the public for charging at all times.

GENERAL TERMS AND CONDITION

This schedule is subject in all respects to the Company’s “General Terms and Conditions for Furnishing Electric Service” and the Company’s “Electric Service Rules and Regulations.”
EXHIBIT A
(Delmarva Redlined and Clean Tariff Pages)
CHARGING RATES

SERVICE CLASSIFICATION

| CHARGING RATE FOR ELECTRIC VEHICLE (EV) OPERATOR | Level 2 (L2) | Direct Current Fast Charging (DCFC) | Direct Current Fast Charging (DCFC) |
| Charging Stations | Charging Stations | Standard Rate | Multi-Vehicle Rate |

PUBLIC ELECTRIC VEHICLE CHARGING SERVICE “PC-PIV”

| Charging Rate | $ 0.18 per kwhr | $ 0.34 per kwhr | $ 0.255 per kwhr |

Charges under Service Classification “PC-PIV” will be administered and billed through the Company’s third-party vendor (Network Provider) on behalf of the Company. Information on opening an account with the Company’s Network Provider is available on the Company’s website. EV operators that charge their vehicle at a Company-owned station are subject to the payment terms of the Company’s Network Provider.

Any EV operator using Company-operated public EV charging stations for the purpose of Plug-in Vehicle (“PIV”) battery charging shall pay for such service at the rates listed above. Upon Company verification and account registration, a user operating within the Company’s electric distribution territory 5 or more EVs titled and registered with the Maryland Department of Transportation Motor Vehicle Administration is eligible for a DCFC Charging Stations Multi-Vehicle rate equal to 75 percent of the DCFC Charging Stations Standard rate. These rates are subject to change periodically, subject to Commission approval.
SERVICE CLASSIFICATION "PC-PIV"
PUBLIC ELECTRIC VEHICLE (EV) CHARGING SERVICE

A. Availability

Available only for the purpose of Plug-in Vehicle ("PIV") battery charging from Company-operated Level 2 (L2) and Direct Current Fast Charging (DCFC) public electric vehicle (EV) charging stations. All public EV charging stations will be sited on property either owned by government entities or government-associated organizations or controlled by those entities and organizations (such as through easements, right-of-ways, or similar legal or equitable mechanisms). L2 charging stations shall cover applications with demand loads up to 19.2 kW. DCFC charging stations cover applications with demand loads greater than 19.2 kW.

The service provided under Schedule “PC-PIV” allows EV operators to charge their EV at a Company-owned public charging station. EV operators who reside either within the Company’s service territory or outside the Company’s service territory are eligible to charge their EV at a Company-owned station.

B. Charging Rate for EV Operator

Charges under Service Classification “PC-PIV” will be administered and billed through the Company’s third-party vendor (Network Provider) on behalf of the Company. Information on opening an account with the Company’s Network Provider is available on the Company’s website. EV operators that charge their vehicle at a Company-owned station are subject to the payment terms of the Company’s Network Provider. Upon Company verification and account registration, a user operating within the Company’s electric distribution territory 5 or more EVs titled and registered with the Maryland Department of Transportation Motor Vehicle Administration is eligible for a DCFC Charging Stations Multi-Vehicle rate equal to 75 percent of the DCFC Charging Stations Standard rate.

C. Billing

Service Classification “PC-PIV” is provided in conjunction with the contract for service under the applicable Rate Schedule (the Controlling Rate Schedule), as determined by the availability of each Rate Schedule. Controlling Schedule provisions apply, unless they are specifically altered herein.

Rider “Green” provides 100% renewable energy on a mandatory basis to the Controlling Service Classification associated with Service Classification “PC-PIV.”

D. Conditions

1. Service Classification “PC-PIV” is designed for retail charging service to EV operators at Company-owned public charging stations. Customer-owned EV chargers are not eligible for service under Service Classification “PC-PIV.”

2. The Charging Rate pricing listed in this tariff is part of a pilot program and is subject to change.

3. Additional fees may apply based on siting location.

4. Operation, repair and maintenance of electric vehicle charging stations on this service classification will be the responsibility of the Company.

5. The Company may at its discretion install, relocate, modify, or remove electric vehicle charging stations. Potential modifications to Company operated electric vehicle charging stations may include adding, removing, or changing electric vehicle supply equipment available for charging service. The chargers and the charger site must be accessible to the Company at all times, including accessibility for installing the chargers, maintaining the chargers, or performing any work on the chargers.

6. The charger must be accessible to the public for charging at all times.

Filed June 28, 2019
Effective Usage on and after July 1, 2019

Filed in Compliance with approval at the June 19, 2019 Administrative Meeting
E. Public Service Company Franchise Tax

In addition to the charges provided for in this Service Classification, the Maryland Public Service Company Franchise Tax shall apply to all sales rendered hereunder before the application of the Maryland Sales Tax, unless the Customer is exempt from such tax.

I. Rules and Regulations

The Rules and Regulations set forth in this Tariff shall govern the provision of service under this Service Classification.
CHARGING RATES

SERVICE CLASSIFICATION

CHARGING RATE FOR ELECTRIC VEHICLE (EV) OPERATOR

<table>
<thead>
<tr>
<th>Level 2 (L2) Charging Stations</th>
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PUBLIC ELECTRIC VEHICLE CHARGING SERVICE “PC-PIV”

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</table>

Charges under Service Classification “PC-PIV” will be administered and billed through the Company’s third-party vendor (Network Provider) on behalf of the Company. Information on opening an account with the Company’s Network Provider is available on the Company’s website. EV operators that charge their vehicle at a Company-owned station are subject to the payment terms of the Company’s Network Provider.

Any EV operator using Company-operated public EV charging stations for the purpose of Plug-in Vehicle (“PIV”) battery charging shall pay for such service at the rates listed above. Upon Company verification and account registration, a user operating within the Company’s electric distribution territory 5 or more EVs titled and registered with the Maryland Department of Transportation Motor Vehicle Administration is eligible for a DCFC Charging Stations Multi-Vehicle rate equal to 75 percent of the DCFC Charging Stations Standard rate. These rates are subject to change periodically, subject to Commission approval.

Filed November 18, 2019 Effective Usage on and after January 1, 2020
SERVICE CLASSIFICATION "PC-PIV"
PUBLIC ELECTRIC VEHICLE (EV) CHARGING SERVICE

A. Availability

Available only for the purpose of Plug-in Vehicle ("PIV") battery charging from Company-operated Level 2 (L2) and Direct Current Fast Charging (DCFC) public electric vehicle (EV) charging stations. All public EV charging stations will be sited on property either owned by government entities or government-associated organizations or controlled by those entities and organizations (such as through easements, right-of-ways, or similar legal or equitable mechanisms). L2 charging stations shall cover applications with demand loads up to 19.2 kW. DCFC charging stations cover applications with demand loads greater than 19.2 kW.

The service provided under Schedule "PC-PIV" allows EV operators to charge their EV at a Company-owned public charging station. EV operators who reside either within the Company’s service territory or outside the Company’s service territory are eligible to charge their EV at a Company-owned station.

B. Charging Rate for EV Operator

Charges under Service Classification “PC-PIV” will be administered and billed through the Company’s third-party vendor (Network Provider) on behalf of the Company. Information on opening an account with the Company’s Network Provider is available on the Company’s website. EV operators that charge their vehicle at a Company-owned station are subject to the payment terms of the Company’s Network Provider. Upon Company verification and account registration, a user operating within the Company’s electric distribution territory 5 or more EVs titled and registered with the Maryland Department of Transportation Motor Vehicle Administration is eligible for a DCFC Charging Stations Multi-Vehicle rate equal to 75 percent of the DCFC Charging Stations Standard rate.

C. Billing

Service Classification “PC-PIV” is provided in conjunction with the contract for service under the applicable Rate Schedule (the Controlling Rate Schedule), as determined by the availability of each Rate Schedule. Controlling Schedule provisions apply, unless they are specifically altered herein.

Rider “Green” provides 100% renewable energy on a mandatory basis to the Controlling Service Classification associated with Service Classification “PC-PIV.”

D. Conditions

1. Service Classification “PC-PIV” is designed for retail charging service to EV operators at Company-owned public charging stations. Customer-owned EV chargers are not eligible for service under Service Classification “PC-PIV.”
2. The Charging Rate pricing listed in this tariff is part of a pilot program and is subject to change.
3. Additional fees may apply based on siting location.
4. Operation, repair and maintenance of electric vehicle charging stations on this service classification will be the responsibility of the Company.
5. The Company may at its discretion install, relocate, modify, or remove electric vehicle charging stations. Potential modifications to Company operated electric vehicle charging stations may include adding, removing, or changing electric vehicle supply equipment available for charging service. The chargers and the charger site must be accessible to the Company at all times, including accessibility for installing the chargers, maintaining the chargers, or performing any work on the chargers.
6. The charger must be accessible to the public for charging at all times.

Filed November 18, 2019  Effective Usage on and after January 1, 2020
E. Public Service Company Franchise Tax

In addition to the charges provided for in this Service Classification, the Maryland Public Service Company Franchise Tax shall apply to all sales rendered hereunder before the application of the Maryland Sales Tax, unless the Customer is exempt from such tax.

I. Rules and Regulations

The Rules and Regulations set forth in this Tariff shall govern the provision of service under this Service Classification.
EXHIBIT B
(Letters of Support)
November 14, 2019

Terry J. Romine, Executive Secretary  
Public Service Commission of Maryland  
William Donald Schaefer Tower  
6 St. Paul St.  
Baltimore, Maryland 21202

To Whom it May Concern:

The Baltimore City Office of Information & Technology through its Smart Cities efforts supports the filing (“Filing”) with Revised Tariff Pages submitted to the Maryland Public Service Commission (“Commission”) today by Baltimore Gas and Electric Company (“BGE”), Delmarva Power & Light Company, and Potomac Electric Power Company (collectively, the “Joint Utilities”). Over the next decade, the City of Baltimore will engage residents, City agencies, businesses and other stakeholders to design, build and implement technology to create a safe, thriving and smart city. BCIT’s transportation vision for Baltimore is one of sustaining economic vitality and improving quality of life by attracting and supporting state-of-the-art technological developments and innovation. The city, regional and state leaders are eager to employ smart city technologies to address top transportation issues in Baltimore: transit accessibility, travel reliability, urban congestion, vehicle and pedestrian safety, energy and emissions, freight mobility, and first/last-mile access.

The Filing represents the type of innovation and utilization of technology that would hasten the deployment of EV chargers into underserved areas and would help to ensure residents of Baltimore City are not left out of the benefits of the next generation of transportation infrastructure. Our City’s neighborhoods are hit hard by transportation greenhouse gas emissions. Programs such as the proposal outlined in the Filing bring this issue into focus and help move us toward viable solutions, while also promoting economic development in neighborhoods that need it most.

We encourage the Commission to approve the Filing as another important step toward realizing our vision for Baltimore and the broader region.

Sincerely,

[Signature]

Kenya N. Asli  
Smart Cities Strategist  
Baltimore City Office of Information and Technology
November 15, 2019

Terry J. Romine, Executive Secretary
Public Service Commission of Maryland
William Donald Schaefer Tower
6 St. Paul St.
Baltimore, Maryland 21202

To Whom it May Concern:

The Rebuild Johnston Square Partnership ("JSP") and Rebuild Metro, Inc. by this letter expresses its support for the filing ("Filing") with Revised Tariff Pages submitted to the Maryland Public Service Commission ("Commission") today by Baltimore Gas and Electric Company ("BGE"), Delmarva Power & Light Company, and Potomac Electric Power Company (collectively, the "Joint Utilities"). JSP includes a unique non-profit, institutional, and neighborhood alliance that has been working together to revitalize Johnston Square as a mixed-income community without displacing neighborhood residents. JSP has been working with BGE to consider ways in which the utility can help in efforts to revitalize the community to create a more sustainable, smarter neighborhood poised to meet its citizens’ needs in new and innovative ways.

The Filing illustrates one significant way that BGE can work with Johnston Square and similar communities in the Joint Utilities' footprints to make sure that our residents don’t get left behind in the movement towards transportation electrification. It is important to point out that lower income neighborhoods are among the most affected by greenhouse gas emissions from motor vehicles, and we can thus benefit significantly from cleaner modes of transportation. EVsmart chargers located in our community – which we are currently considering alongside BGE – coupled with the rideshare partnerships and strategies identified in the Filing will allow our residents to more actively participate in an EV future, and enjoy the benefits from clean vehicles, while at the same time creating economic opportunities.

JSP strongly supports the Filing and urges the Commission’s approval to support a cleaner, more viable future for Baltimore’s residents.

If you have any question, please email me at sean.closkey@rebuildmetro.com or call 410-563-6220.

Sincerely,

Sean Closkey
President, ReBUILD Metro
Co-Chair, Rebuild Johnston Square Partnership
November 12, 2019

Terry J. Romine, Executive Secretary
Public Service Commission of Maryland
William Donald Schaefer Tower
6 St. Paul St.
Baltimore, Maryland 21202

To Whom it May Concern:

United Way of Central Maryland ("United Way") today supports the filing ("Filing") with Revised Tariff Pages submitted to the Maryland Public Service Commission ("Commission") by Baltimore Gas and Electric Company ("BGE"), Delmarva Power & Light Company, and Potomac Electric Power Company (collectively, the "Joint Utilities"). United Way makes our communities stronger through our work in Education, Health, Housing and Employment. We work directly with families and individuals to keep them in their homes and out of shelters, with kids who are falling behind in school, and with people who need easier access to healthy food and jobs that pay the bills. We achieve all this with the help of our partners: volunteers, donors, other nonprofits and area businesses who share our passion for making lives and neighborhoods stable and healthier.

In that spirit, United Way looks forward to working with the Joint Utilities and businesses such as Lyft to find innovative ways to work to address transportation access issues. In fact, United Way is currently working with Lyft to offer free rides via our 2-1-1 Helpline to people in need of food, medical, and public benefits assistance. Integrating programs that will enhance access to transportation and reduce vehicle emissions in our communities is a perfect example of the spirit, mission, and goals of United Way of Central Maryland.

United Way strongly supports the Filing and the Commission’s approval.

Sincerely,

Franklyn Baker
President and Chief Executive Officer
November 15, 2019

Mr. Divesh Gupta  
Director of Strategy  
Utility of the Future  
Baltimore Gas and Electric  
110 W. Fayette Street  
Baltimore, MD 21201

Re: Proposed Operator Rate  
Maryland PSC Case No. 9478

Dear Divesh:

Greenlots is pleased to submit this letter of support for BGE’s proposed Operator Rate as a revision to its electric vehicle (EV) charging tariff.

As you know, Greenlots is a leading provider of electric vehicle (EV) charging software and services committed to accelerating transportation electrification (TE) in Maryland, and a wholly owned subsidiary of Shell New Energies. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America, and an increasing percentage of the Level 2 infrastructure. Greenlots’ smart charging solutions are built around an open standards-based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic EV charging loads and improve system efficiency.

As you also know, Greenlots has been an active participant in the Maryland Public Service Commission’s Public Conference 44 EV Working Group. The Commission’s broad and collaborative stakeholder process resulted in a forward-looking set of electric transportation proposals by Maryland’s electric utilities including BGE. In approving many key components of BGE’s proposal, the Commission’s Order positioned our state as an emerging leader in transportation electrification.

In its Order, the Commission intended for BGE to maintain ongoing and iterative communication relating to the design and implementation of its proposals. This proposed Operator Rate is therefore both appropriate and warranted. As BGE notes in its filing, rideshare operators and other multi-vehicle operators typically have much higher demand for charging stations than other drivers. BGE’s proposed Operator Rate leverages that inherent demand to make charging in the field more economical and thus more utilized, because multi-vehicle operators tend to be highly attuned to operating costs. As such, this Operator Rate supports the State’s goal of increasing EV adoption and utilization.
November 15, 2019
Greenlots’ support for BGE’s proposed Operator Rate
Page 2

Importantly, Greenlots appreciates the Commission’s focus on leveraging BGE’s program as a learning opportunity for managing the impact of EV charging at scale, and Greenlots commends BGE for highlighting the accelerated learning potential with this Operator Rate. While EV-specific rate design—including rates tailored to certain user categories such as multi-vehicle operators—are valuable, Greenlots believes that ratepayers will benefit the most from active, technology-based managed charging. In fact, when combined with rate design, technology has the potential to significantly amplify the benefits of those rates for drivers and ratepayers alike. Greenlots views an EV rate as a passive instrument from the utility’s standpoint— but one that requires customer awareness and customer behavior change. On the other hand, technology-based managed charging allows the utility, multi-vehicle operator, or site operator/host to more actively manage load while enabling a more user-friendly, “set it and forget it” driver experience. Greenlots therefore appreciates BGE’s interest in continuing to explore managed charging, both broadly and within the specific context of multi-vehicle operators.

In light of this, Greenlots commends BGE for proposing this revised charging tariff and respectfully recommends its favorable adoption by the Commission.

Sincerely,

Josh Cohen
Director, Policy
November 15, 2019

Terry J. Romine, Executive Secretary
Public Service Commission of Maryland
William Donald Schaefer Tower
6 St. Paul St.
Baltimore, Maryland 21202

Dear Executive Secretary Romine:

This letter expresses the support of the American Lung Association for the filing with Revised Tariff Pages submitted to the Maryland Public Service Commission today by Baltimore Gas and Electric Company, Delmarva Power & Light Company, and Potomac Electric Power Company (collectively, the “Joint Utilities”). The American Lung Association is the leading organization working to save lives by improving lung health and preventing lung disease, through research, education and advocacy. Our work is focused on four strategic imperatives: to defeat lung cancer; to improve the air we breathe; to reduce the burden of lung disease on individuals and their families; and to eliminate tobacco use and tobacco-related diseases.

Harmful air pollution and greenhouse gas (GHG) emissions from the nation’s transportation sector pose many dangers for the hundreds of thousands of Maryland residents who suffer from lung diseases. The risks include worsened asthma and other lung diseases, increased risk of hospital admissions and days missed at work and school, and, most seriously, increased risk of premature deaths. The transportation sector is the largest source of GHG emissions in this country, worsening climate change that poses multiple additional threats to the health of Marylanders.

Replacing fossil fuel powered cars and trucks and moving our mobility toward cleaner electrified modes is imperative, especially for communities such as Baltimore. Broad scale vehicle electrification is
increasingly practical, but it still requires public policy support and oversight. It is encouraging, therefore, to see the leadership that Maryland is showing in moving collaboratively forward with the portfolio of vehicle electrification infrastructure programs that the Maryland Public Service Commission has approved and encouraged the state’s utilities to undertake.

The Lung Association supports efforts to encourage ridesharing using electric vehicles, and particularly, to make them more readily available for lower income communities. Ridesharing means that the clean air and climate benefits of these vehicles will be even better than even the average single-use electric or other low emissions vehicle. Because the program is specifically intended to be located in or near communities that are overburdened by pollution and underserved by existing transportation modes, this can help with air quality where it is most needed, and also support jobs and mobility where also most needed.

We encourage the Commission to approve this proposal and then study the results of the program for future variations, improvements and deployments. If the results are as positive as we anticipate they will be, we would hope this would be an example for other states around the nation.

Sincerely,

Aleks Casper
Director, Advocacy
MD, VA, DE, DC