

Internal utility costs

- a. Necessary Distribution/Transmission system upgrades to existing infrastructure
- b. Internal utility costs of distribution extension as allocated
- c. Distribution equipment from existing infrastructure to service drop
- d. Transformer at service drop
- e. Service drop
- f. Meter
- g. Capitalized labor associated with the above
- h. Property taxes associated with the above
- i. Insurance associated with the above

Customer costs

- a. Customer's portion of construction allowance
- b. Infrastructure from meter to charger
- c. Charger
- d. Charger installation
- e. Charger awning/kiosk construction
- f. Site engineering - electrical design work for charging facilities

- g. Pavement of charging area
- h. Other non-Charger electrical (lighting, kiosk)
- i. Other on-site service connections (service line to C store, restrooms)
- j. Other on-site construction (C store, restrooms)
- k. Construction and/or pavement of access from public roadway
- l. Pavement of parking not in charging area
- m. Site drainage
- n. Site engineering - electrical design work for non-charging facilities
- o. Site engineering - pavements, drainage
- p. Permitting of civil engineering of site
- q. Permitting of charger installation
- r. Engineering/permitting of other non-Charger electrical (lighting, kiosk)
- s. Engineering/permitting of other non-Charger electrical (C store, restrooms)
- t. Land cost
- u. Land acquisition cost (title, etc.)
- v. Land acquisition process cost (real estate search and evaluation)
- w. Capitalized labor associated with any of the above

- x. Property taxes associated with any of the above
- y. Insurance associated with any of the above

WHEREFORE, Staff requests that the Commission order each party to file its opinion as to which of the above-referenced cost categories should be eligible for subsidization by utilities or eligible for special tariff/accounting/ratemaking treatment under a “make ready” approach in File No. EW-2019-0229, by March 14, 2019; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 5th day of March, 2019, to all counsel of record.

/s/ Whitney Payne