

Daniel Sawmiller  
1668 McCoy Rd  
Columbus, Ohio 43220  
[dsawmiller@nrdc.org](mailto:dsawmiller@nrdc.org)

March 9, 2021

**RE: Electric Vehicle Manufacturing Opportunities in Ohio and Registration Fees**

Dear Senator:

I am writing to urge your support of policies that will help to attract new manufacturing opportunities in Ohio's automotive supply chain while reducing emissions in our transportation sector; with immediate attention to Ohio's electric vehicle (EV) registration fees.

With electric vehicles expected to reach price parity with internal combustion engine vehicles by 2023 (**see Figure 1**), the global automotive supply chain is experiencing significant disruptions. This creates both risk and opportunity for Ohio as auto OEMs are not expected to maintain two separate supply chains, one for EVs and one for internal combustion engines.

It is imperative that we – as a state - become purposeful in our intent to attract this new industry, which includes understanding how various seemingly unrelated policy decisions could impact Ohio's ability to compete for these highly competitive manufacturing opportunities. Investment decisions are being made today by supply chain manufacturing companies, and once the facilities are sited, they will be cemented in those locations for decades. This requires Ohio lawmakers and other stakeholders to act quickly and with diligence so that Ohio's automotive legacy can continue well into the future.

As you know, Ohio is an automotive powerhouse with a significant automotive supply chain (**see Figures 2 and 3**). And our state has already made its mark in the growing battery materials supply chain by attracting the GM/LG Chem cell manufacturing joint partnership to Lordstown. Of the nearly 200 battery megafactories around the world, the overwhelming majority are in China. In fact, China currently dominates every aspect of the Lithium-Ion value chain (**see Figure 4**). This is critical to address as Lithium Ion is widely anticipated to be the leading battery technology for the foreseeable future. As I've noted, we must be purposeful in our attempt to attract these industry players to not only the United States, but to Ohio directly.

Of the 9 total megafactories planned in the US (of which only 3 are active), the \$2.3B investment in Lordstown, Ohio gives our state a leg up in becoming a supply chain hub for the growing electric vehicle manufacturing industry. But the presence of that facility alone will not be sufficient to attract the rest of the supply chain; from the chemical processing, cathode and anode manufacturing and even recycling to completely close the supply chain loop inside Ohio. This supply chain transition to EVs will require billions of dollars of additional manufacturing investment, for which Ohio must compete globally (**see Figure 5**).

To better understand this opportunity, the Natural Resources Defense Council (NRDC) has worked alongside JobsOhio for the last year to analyze the key advantages that Ohio has, and the policy needs to support investment attraction activity for the state. A public report detailing our findings is forthcoming, but I'm writing now to highlight a simple step that can be taken today to start positioning

Ohio as an EV-friendly state which will serve to assist the investment attraction exercise that is underway.

Demand-side and supply-side policy incentives and protections can have a domino effect on domestic supply chain growth. There is a litany of examples of the types of policies that different countries have used to date, but one thing is clear: governmental policy on EVs correlates strongly with manufacturing market share (**see Figure 6**). Most immediately, Ohio can make a simple revision to its EV registration fees as a way to align Ohio policy with efforts to attract manufacturing investment.

Ohio's current EV registration fee levels (\$200 for all electric vehicles, \$200 for plug-in hybrids, and \$100 for internal combustion engine hybrids) stand out as an outlier among states we must compete with for manufacturing opportunities domestically. By reducing these fees now, *Ohio can take an important step to signal its desire to build on its automotive heritage by attracting the manufacturing supply chain of the growing electric vehicle market.* This can be accomplished with a very minimal impact on Ohio road fund revenue as EV fees represent less than one percent of that revenue today. To maintain Ohio's outlying exorbitant EV fees, we would trade a small pot of road fund dollars for the greater good of positioning our state for success in its efforts to develop a battery materials manufacturing supply chain hub.

More than protecting our automotive industry legacy and the associated jobs, supporting electric vehicle adoption can help Ohio to reduce transportation sector emissions. Electric vehicles have a lower carbon footprint when compared to their internal combustion engine counterparts. Still, Auto OEMs desire to sell electric vehicles to their customers that have the lowest possible carbon footprint, which includes efforts to decarbonize their supply chains (**see Figure 7**). Ohio has the benefit of a quickly growing solar industry which can also serve as a key investment attraction asset, adding to Ohio's other advantages. These other advantages include but are not limited to: extensive history with auto supply chain industries, proximity to resources, manufacturers and end markets, proven logistics and infrastructure, and a highly skilled workforce (**see Figures 8 and 9**).

*For these reasons, NRDC encourages you to take the immediate step of reducing Ohio's registration fees for electric vehicles to \$100 for fully electric, \$50 for plug-in hybrids, and \$0 for internal combustion engine hybrids.*

We also encourage you to continue exploring other policy opportunities to position Ohio as a leading state for the automotive supply chain of the future. I am available to discuss this with you further and would be happy to offer our lead researchers from Benchmark Mineral Intelligence to help you better understand the key drivers for attracting investment in the battery materials manufacturing supply chain.

Thank you.

Dan Sawmiller  
Ohio Energy Policy Director  
Natural Resources Defense Council  
[dsawmiller@nrdc.org](mailto:dsawmiller@nrdc.org)  
419.733.3145

# Figures: Prepared by Benchmark Mineral Intelligence

Figure 1: EVs will reach price parity with ICE Vehicles as early as 2023

Increasing scale and new technologies in the anode and cathode are seeing average EV cell costs fall to below \$100/KWh in 2023-2024



Figure 2: Ohio has a strong automotive supply chain with proximity to key markets

## Ohio is an automotive powerhouse...

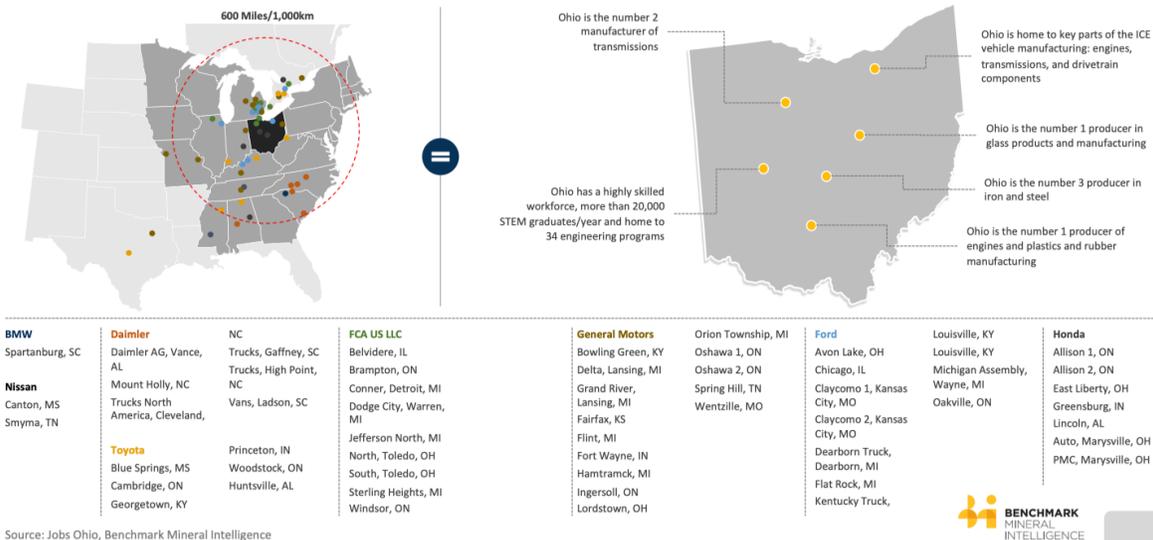


Figure 3: Ohio has a strong automotive workforce and supply chain presence

## Ohio has the building blocks for a growth in EV manufacturing: The 2nd largest auto workforce in the US with a highly technical footprint

### Additive Manufacturing

- America Makes
- University of Toledo Dynamic and Smart Systems Lab
- NEO Additive Mfg Cluster
- Mahoning Valley Innovation & Commercialization Center
- Xavier University MakerBot 3D Printing Innovation Center
- GE Additive Technology Center
- Cincinnati State Technical & Community College Additive program
- University of Dayton Research Institute

### Advanced Materials

- ASM international
- University of Toledo Dynamic and Smart Systems Lab
- PolymerOhio
- The University of Akron National Polymer Innovation Center
- Kent State Liquid Crystal Institute
- The Ohio state University Center for Electron Microscopy and Analysis (CEMAS)
- University of Cincinnati 1819 Innovation Hub
- University of Dayton Research Institute

### Automation

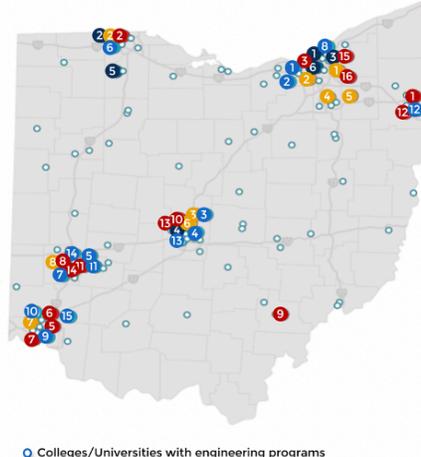
- Cleveland State University: IoT Collaborative
- University of Toledo Dynamic and Smart Systems Lab
- Case Western Reserve University: IoT Collaborative
- The Ohio State University Automation and Optimization Laboratory
- Bowling Green State University Mechatronics Engineering Technology program
- NEO Smart Devices and Systems (IoT) Innovation Cluster

### Other

- NASA Glenn Research Center [LI-ion battery development for the International Space Station]
- Battelle Memorial Institute
- PolymerOhio
- Ohio Manufacturers' Association
- Air Force Research Laboratory [LI-ion for military applications]
- Center for Innovative Food Technology

### Other

- FASTLANE-MEP
- The Manufacturing Advocacy and Growth Network (MAGNET)
- TechSolve
- Southwest Research Institute
- Sinclair Community College
- Youngstown Business Incubator
- Ohio Supercomputer Center
- Emerson Helix Center
- BRITE Energy Innovators

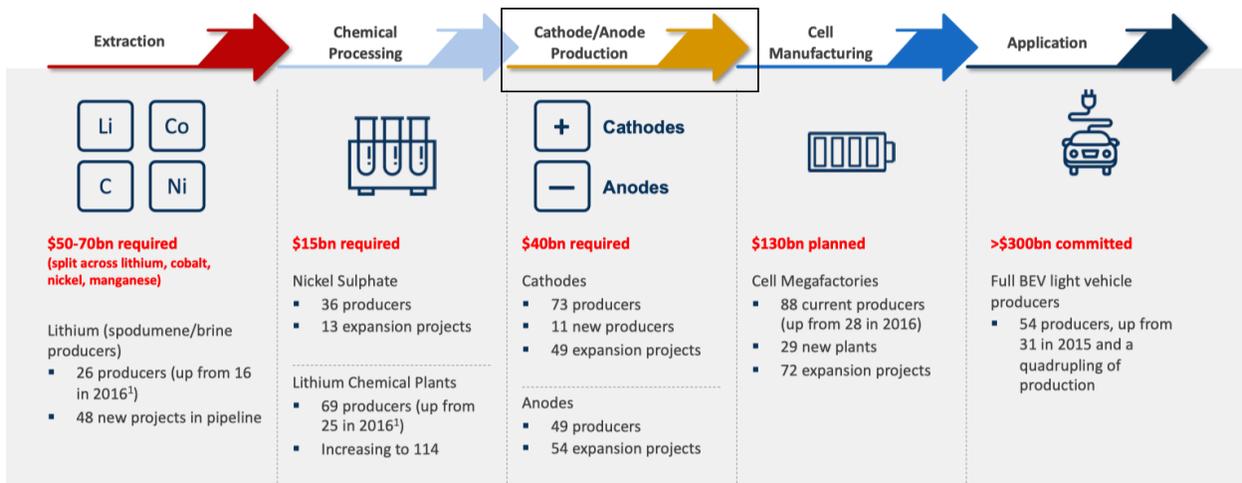


BENCHMARK MINERAL INTELLIGENCE

Source: Jobs Ohio, Benchmark Mineral Intelligence

Figure 4: Billions of dollars will be invested in every stage of the EV supply chain

## The US must compete for the billions of dollars in manufacturing investment the transition to EVs still needs

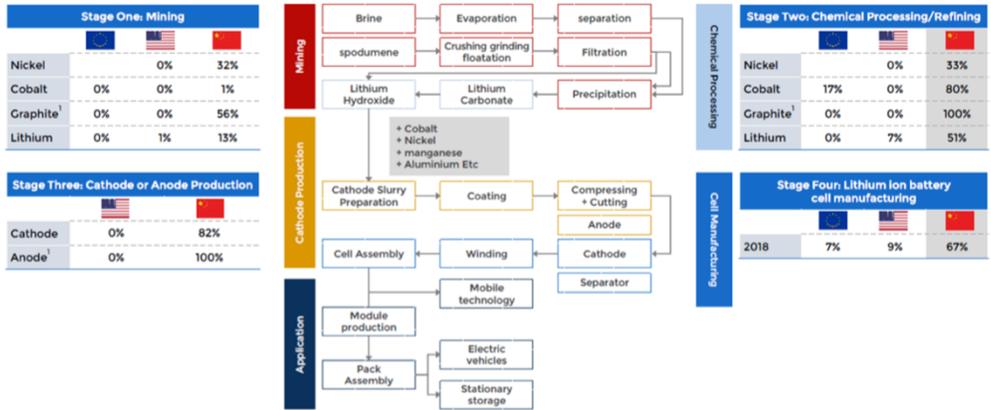


1. Excludes some small-scale Chinese producers  
Source: Benchmark Mineral Intelligence and RHO Motion

BENCHMARK MINERAL INTELLIGENCE

Figure 5: China has taken active policy steps to dominate the battery materials supply chain

### China is dominating this EV battery manufacturing arms race while the US lags behind



1. Graphite data based on natural flake graphite and spherical graphite anode material. Graphite can also be synthetically<sup>2</sup> produced.  
2. If under 1% listed as 0%



© Benchmark Mineral Intelligence 2020

Figure 6: Demand and supply-side policies correlate with manufacturing market share

### Major Consideration: Demand side policies have a domino effect on domestic supply chain growth

	Global EV market	Government Policy				Manufacturing Market Share	
		Demand-side Incentives	Demand-side Requirements	Supply-side Incentives	Supply-side Protections	Chemical Processing (%)	Cell Manufacturing
China	43%	Strong. Phase out plan discarded post-COVID.	Strong - potentially contracting	Strong and continuing	Strong and continuing	Nickel 68 Cobalt 70 Graphite 100 Lithium 56	75%
Europe Union	25%	Strong and expanding.	Strong and expanding	Strong and expanding	Still being formulated	Nickel 13 Cobalt 16 Graphite 0 Lithium 0	7%
United States	20%	Initially strong - Biden Admin. expected to increase	Very little, but will be revisited by Biden Admin.	Very little, but Department of Energy to announce plans soon	Very little, but Department of Energy to announce plans soon	Nickel 2 Cobalt 0 Graphite 0 Lithium 1	8%

**Key Ohio advantage:** Can quickly take a leadership position among US states for implementing both upstream and downstream policies



Source: Benchmark Mineral Intelligence; Rho Motion, Benchmark Forecasts

Figure 7: Auto OEM's are seeking to lower their carbon footprint with local renewable energy

### Automotive companies have also been especially aggressive about commitments to go 100% renewable

Company	Target
	<ul style="list-style-type: none"> <li>Source 100% of electricity from renewable sources in the U.S. by 2030 and globally by 2040</li> <li>Enable the recycling of 100% of end-of-life EV batteries</li> <li>Establish a sustainable material target of at least 50% by 2030 for all vehicles</li> <li>To reduce absolute Scope 1 and 2 GHG (CO2e) emissions by 31% by 2030 compared to a 2010 baseline</li> </ul>
	<ul style="list-style-type: none"> <li>2030 Vision includes: Reduction of CO2 emissions intensity by 1% per year</li> <li>eMaaS service to be offered worldwide</li> <li>90% reduction in CO2 emissions intensity from the use of automobiles</li> <li>Electrifying two-thirds of its global automobile sales by 2030</li> <li>Cutting total product life cycle CO2 emissions in half by 2050 from 2000 levels</li> <li>Purchase of solar power from a solar facility in Texas in the fall of 2021</li> <li>Lowering CO2 emissions intensity by 30% from the 2000 base year level by 2020</li> </ul>
	<ul style="list-style-type: none"> <li>Aspire to achieve carbon neutrality by 2050</li> <li>Aspire to achieve zero air emissions from the facilities</li> <li>Will use 100 percent locally sourced renewable energy for all manufacturing plants globally by 2035</li> <li>Will make zero water withdrawals for manufacturing processes</li> <li>Will eliminate single-use plastics from the operations by 2030</li> <li>Aspire to only use recycled and renewable plastics in our vehicles globally</li> <li>Interim target of 20% renewable and recycled plastics by 2025 as Ford makes progress toward a circular economy</li> </ul>
	<ul style="list-style-type: none"> <li>Plans to have 304 hectares of green area and ecological corridors by 2024</li> <li>Committed to reducing GHG emissions</li> <li>Maximizing powertrain efficiency</li> </ul>
	<ul style="list-style-type: none"> <li>Purchase CO2 free energy only from the end of 2020- worldwide</li> <li>One fourth of vehicles sold in Europe should be electrified by 2021, a third in 2025 and half in 2030</li> <li>Targets producing seven million electric vehicles (EVs) by 2030</li> </ul>
	<ul style="list-style-type: none"> <li>Plans to reduce carbon emissions per vehicle by at least one third across its entire life cycle, right from the supply chain to the end of the use by 2030</li> </ul>

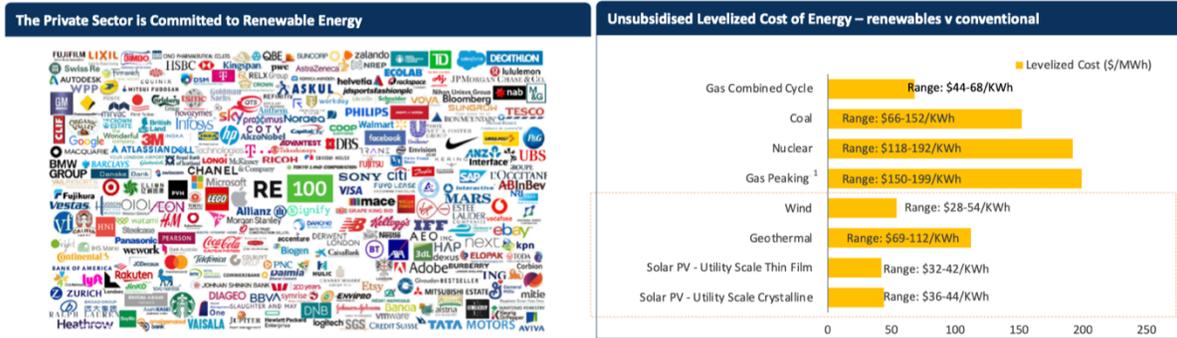
Figure 8: Ohio has a number of key advantages that can be supported by sound policy

### Ohio has several key advantages to spur upstream EV supply chain investment



Figure 9: Ohio's growing solar industry offers cost-competitive local renewable energy to potential manufacturers in the EV supply chain

Electricity costs have a large influence on manufacturing OPEX so deployment of low-cost renewable energy has a direct positive impact



RE100 is the global corporate renewable energy initiative bringing together businesses committed to 100% renewable electricity.

LCOE measures total costs of building and operating a facility over its lifetime – renewables are beating fossil fuels. Over the past decade, solar PV costs have fallen by 85%. Utility scale renewable energy prices are now below coal and gas (even at unsubsidised rates).

**Key objective: Promote growing state renewable energy pipeline to help attract EV supply chain investment**

1. Assumes cost of \$3.45/MMBtu  
Source: Benchmark, Lazard