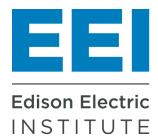


VIA E-MAIL



March 17, 2021

Chair Stephanie Kunze
Vice Chair Bill Reineke
Ranking Member Nickie J. Antonio
Transportation Committee
Senate Building
1 Capitol Square
1st Floor
Columbus, OH 43215

Re: OH Sub HB 74, Amendment No. AM_134_0724

Dear Chair Kunze, Vice Chair Reineke, Ranking Member Antonio, and members of the Transportation Committee,

The Edison Electric Institute (EEI) respectfully submits these comments to the Ohio Senate Transportation Committee (Committee) in consideration of the above-referenced amendment and legislation, Sub HB 74, Amendment AM_134_0724. EEI monitors various electric vehicle (EV) proceedings and legislation across the country and appreciates the opportunity to comment on this piece of legislation that could advance EV development in Ohio and, through this process, consider other suggestions to strengthen the bill, which would further support the deployment of EV infrastructure in the state.

EEI is the association that represents all U.S. investor-owned electric companies. Our members provide electricity for more than 220 million Americans and operate in all 50 states as well as the District of Columbia. EEI's members include all investor-owned electric companies that serve customers in Ohio. Collectively, the electric power industry supports more than 7 million jobs in communities across the United States. Our members in all parts of the country provide Americans with reliable, affordable, and sustainable electricity, and are committed to giving all customers the electricity services they desire at rates that are reasonable and equitable.

Nationally, the current lack of EV charging infrastructure is one the primary barriers to widespread EV adoption. EEI and the Institute for Electric Innovation (IEI) released a report in 2018 forecasting 18.7 million electric vehicles on the road by 2030. To support that many EVs by 2030, 9.6 million charging ports will be needed. This penetration is unlikely to be successfully achieved without significant additional investment.

¹ Edison Electric Institute and the Institute for Electric Innovation, Plug-in Electric Vehicle Sales Forecast Through 2025 and the Charging Infrastructure Required Through 2030, November 2018, available at http://www.edisonfoundation.net/iei/publications/Documents/IEI_EEI%20EV%20Forecast%20Report_Nov2018.pdf
² See Id.

Amendment No. AM_134_0724 seeks to facilitate these goals while allowing the Public Utility Commission of Ohio (PUCO) the flexibility to support energy company EV infrastructure and charging by updating the Contribution in Aid of Construction (CIAC) rules in Ohio. By modernizing these rules through adoption of this amendment, Ohio can help accelerate energy company EV deployment and benefit customers by helping to integrate EV charging and related infrastructure into the grid in a cost-effective manner.

Thank you for the opportunity to provide comment on these issues. EEI looks forward to working with the Committee and other interested stakeholders as you set a pathway for greater EV deployment that benefits all of Ohio's citizens.

Respectfully submitted,

Adam L. Benshoff

Vice President, Regulatory Policy

Adam L. Benshoff

Edison Electric Institute 701 Pennsylvania Ave., N.W.

Washington, DC 20004-2696

abenshoff@eei.org