

**TESTIMONY OF ROBERT KELTER**  
**ENVIRONMENTAL LAW AND POLICY CENTER**  
**SENATE PUBLIC UTILITIES COMMITTEE**  
**IN SUPPORT OF SB 106**  
**WEDNESDAY, NOVEMBER 5, 2025**

Good morning, Chair Wilkin, Vice Chair Reineke, Ranking Member DeMora and members of the committee. My name is Robert Kelter and I'm a senior attorney at the Environmental Law and Policy Center (ELPC). Thank you for the opportunity to submit testimony. ELPC is a regional environmental organization with offices in Ohio, Illinois, Michigan, Wisconsin and Iowa. We have litigated numerous cases at the Ohio Public Utilities Commission, including cases involving electric vehicle (EV) charging issues.

ELPC strongly supports the development of the EV market, because EVs offer an opportunity for customers to drive zero emission vehicles. In order to develop the EV market, we need the best possible network of charging stations. We believe that the optimal way to develop such a market comes from charging stations owned and operated by private companies. Competitive charging companies have incentives to provide the cheapest power at the lowest cost, and to provide reliable operations at stations. Failure on either front means loss of profits. Utilities would not have the same incentives to maintain reliability, and they would not have the incentives to compete with lower prices.

We do think that the committee should consider shortening the "area of last resort" time period where a utility can build a station from five years to three years. Also, we think the Commission should conduct a study after three years of the development of the EV charging market, and include in the study analysis of the ten mile distance for areas of last resort. These modifications would enhance the development of the competitive market.

ELPC thanks the committee for its consideration of this important issue.