



April 4, 2022

Ohio Senate Energy and Public Utilities Committee  
1 Capitol Square  
Columbus, OH 43215

Re: Written comments on SB 307

Dear Chair McColley, Vice Chair Schuring, Ranking Member Williams and members of the Senate Energy and Public Utilities Committee:

We strongly support both the legislative intent and substance of SB 307, as introduced. We especially appreciate the robust stakeholder process that led to the bill's introduction, and its call for regulated utilities to play an active role in electric vehicle (EV) infrastructure investments and market transformation. The organization I lead, the Alliance for Transportation Electrification (ATE), is composed of a wide range of stakeholders in the EV industry, including automotive companies, electric utilities, and EV charging infrastructure companies and service providers. Established in early 2018 on a multi-sector basis as a non-profit public benefit corporation, or trade association, we are actively engaged in over 25 States and jurisdictions in the country, largely focused on state utility commissions and legislatures and other state agencies. You can find additional information on our website: <https://evtransportationalliance.org>.

For Ohio to meet the goals of SB 307, **we believe the state's electric utilities should be closely engaged in market development for the following reasons:**

- Utility commissions in North Carolina, Arizona, Illinois, Michigan, Missouri, Kansas, Indiana, Minnesota, and others have allowed utilities to propose a variety of programs, stimulating development of EV infrastructure to meet customer needs while **demonstrating to the automotive industry that their state supports EV investment and job growth.**
- The increased investment in utility EV infrastructure will result in savings for ALL electricity customers through better utilization of the grid which will, at scale, put downward pressure on rates.
- **Utilities can fill market gaps, such as in rural communities.**
- Utility programs emphasize interoperability, open standards, and easy access for all customers.
- Utility involvement in infrastructure investment by public and private entities enhances coordination among all market players
- **Regulated utilities and non-utility service providers can co-exist and prosper** as the market scales up to significant levels.
- Regulated utilities are obligated to provide **service to all customers and host sites who request service no matter their financial status or geographic location.**
- Utilities, subject to Commission oversight, will bear the responsibility to maintain and operate charging stations funded with ratepayer dollars in a reliable way, responding in a timely way to EV owner and consumer complaints.

Strong utility involvement leverages the utility's technical and customer services expertise and catalyzes economic development and jobs. Technologically, Ohio is well-primed to take advantage of this once-in-a-generation opportunity to accelerate clean transportation nationally. Combining the resources of the

marketplace with regulated utilities offers a valuable player with extensive resources. Public Utility Commission of Ohio (PUCO) regulations also can add certainty to the emerging marketplace.

We believe that passing legislation supporting a strong utility role in EV infrastructure will bring more jobs to Ohio and will boost manufacturing to give the state a competitive advantage. Ohio can be a leader in EV market development by facilitating effective coordination among the state agencies, with a strong involvement by the PUCO. This market transformation involves multiple agencies (legislatures, utility commissions, state energy offices, consumer advocates, transportation agencies, licensing agencies, environmental agencies, and governor's offices).

States, either through legislative directives or through their Public Utility Commissioners (PUCs) have taken forceful actions over the past five years. These states have acted in a thoughtful and determined manner either in response to direct statutory direction from the legislature or under their broad discretion to regulate in the public interest and ratemaking authority. Recently, for example, the Indiana Legislature enacted a modest but comprehensive legislative framework (HB 1221) that allows regulated utilities to develop portfolio programs, including school bus and public transit, with both the option for owning and operating the EV infrastructure including the charger as well as a make-ready approach.

### **The Case for a Utility Role in EV Infrastructure: Extending EV Charging Service to ALL Customers**

Regulated utilities have core strengths and competencies that will be beneficial in this nascent stage of market development. In the long term, the Alliance believes regulated utilities play a vital role in providing services that private providers will ignore. While the private, third-party market will focus just on the potentially most profitable areas in which to invest, utilities will bring benefits to underserved neighborhoods, including the difficult to serve multi-family units, that are necessary to ensuring an equitable development of EV infrastructure. Compared to non-utility service providers, regulated utilities have stronger balance sheets, and have access to debt and equity capital at low-cost rates.

In summary, we wish to stress the importance of maintaining flexibility and certainty so that regulated utilities can participate fully in this nascent marketplace. Statutory flexibility gives the PUCO (and other state agencies) the ability to develop programs and tariffs according to the factors and conditions that are specific to the electric vehicle supply equipment (EVSE) use case. The details do matter, and the issues are complex as the distribution grid evolves into more of a bi-directional network capable of integrating many innovative distributed energy resources of which EVs are one important piece of the puzzle.

We look forward to engaging further in this process. Please contact us at the Alliance if you have any questions or concerns at: Philip B. Jones, Executive Director, or Rick Tempchin Senior Advisor at 202-258-2912 or [rick@evtransportationalliance.org](mailto:rick@evtransportationalliance.org).

Sincerely,

*Philip B. Jones*

Philip B. Jones

Executive Director, ATE  
1402 Third Avenue, Suite 1315  
Seattle, WA 98101  
206-335-5451

[phil@evtransportationalliance.org](mailto:phil@evtransportationalliance.org)