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BOUNDLESS ENERGY™

November 29, 2022

The Honorable Rob McColley
Chairman
Senate Energy and Public Utilities Committee
1 Capitol Square
Columbus, Ohio 43215

Chairman McColley and committee members:

My name is Marc Reitter, President and Chief Operating Officer for AEP Ohio. AEP Ohio appreciates the opportunity to offer comments on the proposed substitute version of Senate Bill 307 (SB 307) that is before the committee.

In our prior testimony in support of the as-introduced version of the bill, we iterated AEP's strong commitment to the increased deployment of plug-in electric vehicles (PEVs) and related infrastructure throughout Ohio. A large barrier to success, however, is that there is currently no clear pathway for the utility investment necessary to optimally support customer PEV demand. Under the original legislation, these barriers are removed by allowing utilities to file transportation electrification plans (TEPs) with the PUCO and by implementing a framework for the PUCO to evaluate those plans.

As a reminder, TEPs can include customer outreach and education, rate designs and programs that are appropriate for PEVs in Ohio. Any utility TEP filed with the PUCO will be challenged and scrutinized by intervening parties as it goes through procedural due process, will endure Commission review and can only proceed with Commission approval, which will be predicated on a finding that the program(s) both maximize program benefits while minimizing overall program costs prior to implementation.

To address stakeholder concerns, AEP Ohio committed through interested party conversations to the removal of language that contemplated the ability of utilities to own and operate PEV chargers. Any substitute bill under consideration should uphold regulatory clarity that is necessary for optimal utility investment in PEV infrastructure to address the challenges of PEV adoption. AEP Ohio believes that true compromise, rather than eliminating TEPs entirely from the bill, is a better path forward for the state.

Customer adoption of PEVs will continue to increase and Ohio must comprehensively prepare for this new reality. AEP Ohio appreciates the work of the committee and the bill sponsor and looks forward to further discussions.

Sincerely,

A handwritten signature in blue ink, appearing to be 'M. Reitter', written in a cursive style.

Marc Reitter
President and COO, AEP Ohio