



March 18, 2021

RE: H.B. 74 – EV Charging and Contribution in Aid of Construction Rules

Chair Kunze, Vice Chair Reineke, Ranking Member Antonio, and Members of the Senate Transportation Committee,

ChargePoint writes to you as an interested party on House Bill 74, the state's transportation budget. Specifically, we wish to express support for Amendment No. AM_134_0724-1, which relates to Ohio's contribution in aid of construction ("CIAC") rules.

Since 2007, ChargePoint has been committed to making it easy for businesses and drivers to go electric, with the largest electric vehicle ("EV") charging network and most complete set of charging solutions available today. ChargePoint's cloud subscription platform and software-defined charging hardware includes options for every charging scenario from home and multifamily to workplace, parking, hospitality, retail and fleets of all kinds. ChargePoint continues to create the new fueling network to move all people and goods on electricity now and in the future.

While Ohio has already enjoyed success in EV adoption and EV charging deployment, there are still obstacles on the road ahead. Amendment No. AM_134_0724-1 would overcome one such obstacle by modernizing CIAC rules, thereby facilitating utility provision of "make-ready" infrastructure to support increased deployment of EV chargers by businesses, fleet operators, and public entities. Make-ready infrastructure includes all the electrical and construction work necessary to make a site ready to connect EV charging equipment. Typically, make-ready costs exceed EV charging hardware costs, and make-ready costs are unlikely to experience significant reductions over time.

Updating CIAC rules would benefit all Ohioans, whether they own an EV or not. Adding charging stations in workplace and fleet locations can extend the daily range of EVs, increase EV visibility, and expand EV awareness. Research has shown that supporting deployment of charging stations at workplaces makes employees six times more likely to purchase an EV, which would support Ohio's growing EV industry and support beneficial load growth.

Additionally, modernizing CIAC rules would support the electrification of public fleets (municipal fleets, public transit, school buses, etc.). This would create widespread direct and indirect benefits including, but not limited to, (i) families with school children, who will benefit from the availability and use of electric school bus fleets; (ii) public transportation patrons, who will benefit from the availability and use of electric city bus fleets; (iii) fleet owners, who will benefit from lower total cost of ownership and a healthier experience for drivers; and (iv) society, which will benefit from lower emissions, improved air quality, and a downward pressure on electricity rates for all ratepayers.



Importantly, the proposed approach clears the way for continued use of popular rebate programs, which are proven tools to promote EV adoptions. Moreover, the proposed language preserves the role for private sector market participants, like ChargePoint and our competitors, to continue pushing the envelope on innovation and competition, and more importantly preserves the customer's choice for their EV charging solution.

Ohio can, and should, be a leader for transportation electrification and EV charging infrastructure. ChargePoint is excited to already be a part of that future and are ready to work with you to keep Ohio moving forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Miller".

Kevin George Miller
Director, Public Policy
ChargePoint