



# Ohio Environmental Council

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## Ohio Environmental Council's Comments In the Matter of the Commission's Investigation into the Implementation of the Federal Infrastructure Investment and Jobs Act's EV Standard 22-1025-AU-COI

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February 1, 2023

On behalf of the Ohio Environmental Council ("OEC"), our nearly 100 environmental and conservation group members, and our thousands of individual members throughout the state, we thank the Public Utilities Commission of Ohio (PUCO) for the opportunity to comment on the proposed Electric Vehicle (EV) standard. The mission of the OEC is to secure healthy air, land, and water for all who call Ohio home. Implementing the proposed Public Utility Regulatory Policies Act (PURPA) EV standard is an important step in rising to the challenges climate change will present for Ohio.

**The OEC supports the proposed electric vehicle standard.** Ohio's electric vehicle market is rapidly growing. In 2021, Ohio drivers registered 21,200 new electric vehicles and 13,100 new plug-in hybrid vehicles (PHEV).<sup>1</sup> Nationally, electric vehicle sales grew by two-thirds in 2022.<sup>2</sup> The Ohio Department of Transportation's electric vehicle plan states the majority of planned highway fast chargers will fall under this Commission's jurisdiction. As EV demand increases, investor-owned utilities will face unique questions on pricing models and opportunities for demand response. The proposed standard sets a clear guiding policy for appropriately answering these questions.

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<sup>1</sup> <https://afdc.energy.gov/states/oh?menu=az>

<sup>2</sup> <https://www.wsj.com/articles/u-s-ev-sales-jolted-higher-in-2022-as-newcomers-target-tesla-11672981834>

**As utilities approach decisions on price, it should follow this standard's principles of affordability, customer experience, and incentivizing further market adoption.** EV charging infrastructure will create challenges to customer classes. EV charging will be purchased and operated by a variety of customer classes. The customer class owning and operating the EV charger may have riders in its standard charges that are inapplicable or inappropriate for the employees or customers utilizing the charging location.

EV chargers also have a variety of functionalities that may affect pricing structures. For example, level 2 chargers operate with vehicles plugged in for long periods of time. This allows them to better take advantage of behavioral incentives like time of use rates and demand response incentives. However, public DC fast chargers along highways or at shopping malls are less likely to incentivize off-peak charging with a time of use rate and present different demand response opportunities.

The proposed standard sets a clear policy to maximize benefits for consumers and utilities. As other agencies and innovative companies look to Ohio utilities to support the growing EV marketplace, it needs to be prepared with straightforward guiding principles. The proposed standard helps ensure Ohio is ready to meet the opportunities available in the EV market.

Respectfully submitted,  
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### **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing correspondence was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on February 1, 2023. The PUCO's e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

/s/ Karin Nordstrom  
Karin Nordstrom

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Summary: Comments Comment on Proposed EV Standard filed by Karin  
Nordstrom on behalf of the Ohio Environmental Council electronically filed by Ms.  
Karin Nordstrom on behalf of Ohio Environmental Council