
October 31, 2023

Chair Jenifer French
Commissioner Daniel R. Conway
Commissioner Dennis P. Deters
Commissioner Lawrence K. Friedeman
Commissioner John D. Williams
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

Re: Commission's Investigation into the Implementation of the Federal Infrastructure Investment and Jobs Act's Electric Vehicle Charging PURPA Standard, Case No. 22-1025-AU-COI

Dear Commissioners,

Pursuant to the Stipulation and Recommendation approved in Case No. 22-0900-EL-SSO, *et al.*,¹ The Dayton Power and Light Company d/b/a AES Ohio encourages the Commission to commence a review of line extension policies for publicly available electric vehicle supply equipment. Such review is supported by various interested parties, including several who signed that Stipulation.²

Today, for new service to a non-residential customer, AES Ohio is responsible for 60% of all standard construction costs, and the initiating customer is responsible for the remaining 40%, plus applicable tax as its Contribution in Aid of Construction ("CIAC"). PUCO No. 17, Tariff Sheet D12. This CIAC ratio is currently required by Ohio Adm.Code 4901:1-9-07(D)(3)(a).

Although the Commission shall adopt and enforce rules prescribing a uniform, statewide policy regarding electric transmission and distribution line extensions under R.C. 4928.151, nothing in that statute precludes the Commission from adjusting the 60/40 CIAC ratio for line extensions for specific purposes, so long as it applies statewide.

In the case of EVSE, AES Ohio urges the Commission to adopt a policy that for non-residential customers, electric utilities be responsible for 80% of all standard construction costs of line extensions for publicly available EVSE, with the customer responsible for the remaining 20% of the project cost, plus applicable tax. AES Ohio believes this change should not wait for the next five-year rule review of Ohio Adm.Code 4901:1-9-07(D)(3)(a).

Electric transportation is accelerating in the State of Ohio. Vehicle manufacturers have set aggressive targets for EV sales, EV make and model availability is growing, and there is

¹ *In re AES Ohio*, Case No. 22-900-EL-SSO, *et al.*, Opinion and Order (Aug. 9, 2023).

² Correspondence (June 7, 2023).



significant federal public policy support to build out EV charging infrastructure – all of these factors contribute to growing supply and demand for EVs. According to the U.S. Department of Transportation, there are a multitude of economic development, workforce development, health and environmental benefits associated with EV and EV infrastructure adoption³. Modifying the CIAC ratio in the manner proposed above will encourage such investment in publicly available EV charging infrastructure across the state and is in the public interest.

As mentioned above, the Revised Code recognizes the need for consistency in the application of line extension policies across the state; therefore, AES Ohio urges the Commission to adopt an 80/20 CIAC ratio for publicly available EVSE to encourage EV infrastructure investment in the State of Ohio.

Respectfully submitted,

/s/ Christopher C. Hollon

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³ <https://www.transportation.gov/rural/ev/toolkit/ev-benefits-and-challenges/community-benefits>

CERTIFICATE OF SERVICE

I certify that the foregoing document was e-filed with the Public Utilities Commission of Ohio today on October 31, 2023. The PUCO's e-filing system will electronically serve notice of the filing of this document.

/s/ Christopher C. Hollon

Christopher C. Hollon (0086480)

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Case No(s). 22-1025-AU-COI

Summary: Correspondence Letter of AES Ohio in Support of Review of
Contribution in Aid of Construction Policies to Encourage EV Investment
electronically filed by Mr. Christopher C. Hollon on behalf of The Dayton Power and
Light Company d/b/a AES Ohio.