



03/20/2019

Case No. 2019-0229: Request for Party Submissions

Below please find both the Missouri Petroleum Council's (MPC) a Division of the American Petroleum Institute and the American Fuel & Petrochemical Manufacturers comments regarding the PSC's request for party submissions regarding EV Charging Stations.

Missouri Public Service Commission (PSC):

Today's battery electric vehicles capture the public's imagination, as an exciting technology that is said to hold great promise. Despite this interest, the results produced by the substantial resources that many states have already allocated to the promotion of electric vehicles should serve as a cautionary tale: Judging by sales volumes, this technology has been relatively slow to be embraced by consumers. When making policies that cover electric vehicles, Missouri should consider all of the environmental and economic consequences that come from that vehicle due to its raw materials, manufacture, use, and ultimate disposal.

The energy policies of Missouri should provide for consumer choice and allow a free market to determine the mix of energy sources required to meet societal needs. Such policies should not include subsidies meant to accelerate the adoption of EVs and the charging infrastructure necessary to support such vehicle operation in Missouri, particularly through the use of rebates, utility rate increases, and other financial incentives. Nor should they include mandates or arbitrary targets (e.g., so many electric vehicles sold by such and such date). Rather, these policies should demonstrate an awareness of the time involved in making successful energy transitions at the societal level. For despite the assumptions that there will be millions of electric vehicles on the U.S. roads by 2025, it will likely be decades, not years, before we can determine the extent to which EVs provide a viable substitute for those vehicles powered by internal combustion engines in Missouri.

The EV charging infrastructure is currently only used by a small fraction of drivers. To allow utilities to invest in EV charging infrastructure and to then recover the costs of those investments through charges to all of their ratepayers will result in an unfair shifting of costs onto those who have not opted for this technology.

Additionally, there should be concern that any charging station pilot demonstration programs will expand into an ongoing rate-base opportunity for electric utilities by allowing them to build

charging stations in remote locations within a given territory, resulting in unnecessary transmission and distribution infrastructure permanently embedded into their rate bases. The costs for building electric vehicle charging stations should not be paid for by ratepayers. Such infrastructure should be paid for by individual companies in the same way that gasoline stations and truck-stops operate now.

We support the adoption of policies that focus on the consumer, strengthen our energy security, improve our standard of living and protect our environment. Transportation policies should acknowledge that consumers are purchasing internal combustion engine vehicles today, and those vehicles are staying on the road longer and are going farther on a gallon of cleaner Tier 3 gasoline. Transportation policies that conflict with the will of the consumer and attempt to force changes in behavior should be considered with caution as they may impose undue costs on consumers and taxpayers with diminishing environmental benefits and unintended consequences.

Respectfully submitted,

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