



Alabama



December 15, 2017

Mr. Walter Thomas, Secretary
Alabama Public Service Commission
100 North Union Street, Suite 850
Montgomery, Alabama 36130

Re: Generic Proceeding to Determine the Commission’s Jurisdiction over Electric Vehicle Charging Stations -- Docket No. 32694

Dear Mr. Thomas:

On behalf of the National Federation of Independent Business (NFIB)/Alabama membership, below please find comments in response to the order and questions presented by the Alabama Public Service Commission Docket No. 32694. NFIB is America’s and Alabama’s largest advocacy organization representing small and independent businesses. The mission of NFIB is to promote and protect the right of small/independent businesses to own, operate and grow their business.

The Commission’s order is in response to the growing electric vehicle sector and particularly to the Alabama based automobile manufacturers ability to expand into growing markets and provide additional economic expansion for the existing plants and the suppliers. Technological improvements and cost reductions are making electric vehicles a very real option for automobile drivers and probably for larger trucks in the very near future. As these vehicles become cost equivalent to the traditional internal combustion models, the primary impediment left to widespread adoption is the existence and visibility of “charging station” infrastructure. People will continue to hesitate to buy electric vehicles if they fear getting stranded on the major highways and rural areas because they cannot find convenient and frequent “charging stations”.

NFIB/Alabama would encourage the Commission to promote “more charging stations” for consumers throughout the state. An advantage of electrification is the “charging stations” can be sited pretty much anywhere there is an electrical current and they are very easy to operate. Currently there are limited “charging stations” including – municipal parking decks, grocery store lots, university campuses, automotive dealerships and a few restaurants.

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The NFIB Research Foundation's primary purpose is to explore policy related problems small business owners encounter. Since 1973, NFIB has conducted a nationwide monthly survey among small/independent business owners and these published results are frequently quoted by the national news media and elected officials. Unnecessary government regulation is a perennial cause of concern for NFIB members and is particularly burdensome on small/independent businesses that lack the resources and personnel to keep up. Unreasonable government regulations rank as the second or third largest problem following the consistent number one problem of taxes. Here's what *red tape* (government rules and regulations) really means to business owners. The following numbers have only been calculated for federal rules and regulations and does not include state, county and municipal rules, regulations and license fees.

- Total cost of federal regulations on the economy \$2 trillion annually
- Annual regulation costs are 30 percent higher for small businesses than big businesses
- Regulations cost small businesses \$11,724 per employee annually
- Uncertainly caused by future regulation negatively affects a small business's ability to plan for future growth or expansion

In the review of current state statutes, NFIB has not found where the Alabama Legislature has required the Commission to enter and regulate this sector. Since the early 1990's, Governors and the Alabama Legislature have promoted economic development through laws and economic incentive packages to create new Alabama's businesses and expand existing businesses. These laws have not required new, small or existing businesses to be regulated and subject to the same requirements as regulated utilities.

The Commission could support initiatives to increase the number of "charging stations" and provide for utility involvement that can bolster the market through incentive programs, rebates, as well as education to consumers. In addition, the utility can be the source of targeted infrastructure investment—such as strategically placed super-chargers along interstate or highway corridors—that helps spur market growth and increase the demand that will sustain business entry by businesses large and small, urban and rural creating a competitive marketplace for consumers.

If the Commission takes action that is supportive of electrification, the state's existing automakers may be incentivized to make additional investments in Alabama. Mercedes' recent announcement to build electric cars at the Vance location supports that plant along with the suppliers and small/independent businesses. Their announcement is likely to spur additional announcements from the state's other auto manufacturers.

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NFIB would strongly recommend the Commission should not discourage or prevent businesses from pursuing new opportunities by creating unnecessary regulation in this new market of “charging stations”. Small business owners are usually described as “risk takers” but I would suggest they are “opportunity takers” and this innovative technology is an opportunity to expand their business offerings to customers.

If I can provide additional information or answer any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Rosemary Edebash". The signature is fluid and cursive, with a large initial "R" and "E".

Rosemary Edebash
NFIB/Alabama State Director

cc: Judge John Garner