

November 3, 2022

Mr. Steven Kahl
Executive Secretary
North Dakota Public Service Commission
600 East Boulevard Ave., Dept. 408
Bismarck, ND 58505

Re: Case No. PU-22-147 Electrification of Transportation Comments

Mr. Kahl,

Greater North Dakota Chamber (GNDC) submits the following comments in response to the Commission's request for comment regarding electrification of transportation. The Commission posed a question regarding whether ownership of electric vehicle charging stations should be permitted by regulated utilities. Our comments address this question specifically.

GNDC is the largest statewide business advocacy organization in North Dakota. Our purpose is to promote free enterprise and advocate for policies that enable, rather than inhibit economic growth. One of the principles of a free market economy is freedom to participate. In an environment permitting other types of business entities to own electric vehicle charging stations, allowing regulated utilities to participate will help create a competitive environment in which the market can respond to consumer demand. It will also position North Dakota to get infrastructure in place ahead of adapting transportation trends.

Infrastructure, whether it is roads, water, connectivity, or energy, is critical to the success of businesses in North Dakota. Because of this, GNDC supports a business-friendly regulatory environment that is consistent and further promotes investment in infrastructure. Utilities are situated to work unilaterally or in tandem with other stakeholders to ensure distribution network upgrades that enable EV interconnection in communities where overall power demand could otherwise force capital-intensive substation or transmission improvements. While grid impact from EVs today is modest, utilities are in a position to manage the power needs of an increasing number of EV charging sites on its system.

It is critical that we foster a business climate in North Dakota that encourages private investment, research, innovation, and the efficient delivery of products and services to meet the needs of the consumer. Because of this, we firmly believe that regulated utilities should not be prevented from owning electric vehicle charging stations.

Respectfully,



Arik Spencer
President & CEO
Greater North Dakota Chamber

28 PU-22-147 Filed 11/03/2022 Pages: 1
Public Comments
Greater North Dakota Chamber (GNDC)
Arik Spencer, President / CEO