



November 10, 2022

Public Service Commission
600 E. Boulevard Ave., Dept. 408
Bismarck, ND 58505-0480

Notice of Issues and Request for Comment RE: [Case No. PU-22-147](#)

The Lignite Energy Council (LEC) appreciates the opportunity to provide public comment regarding the upcoming electrification of transportation hearing at the Public Service Commission. Due to the passage of the 2021 Infrastructure Investment and Jobs Act, there was direction provided from the federal government to the states that, “each state shall consider measures to promote greater electrification of the transportation sector...” with a list of specific ways to adopt electric vehicle charging infrastructure.

For the past few years, LEC has been engaged in the promotion of electric vehicles as the members of our trade association supply affordable, reliable and dispatchable electricity that powers around 60% of the electric grid in North Dakota and also export a large percentage to our neighboring states. While there are only currently around 400 electric vehicles in our state, all of the major automobile manufacturers are shifting to produce more electric vehicles and some brands are shifting their fleet to produce only electric vehicles in the coming years. To help increase consumer awareness and acceptance of electric vehicles, LEC has founded the DriveElectricND organization to best participate in this pursuit. The LEC and DriveElectricND believe electric vehicles can improve the consumer welfare of North Dakotans by increasing the number of transportation choices available to residents. DriveElectricND’s research indicates lack of charging infrastructure is one of the largest impediments to accelerating the uptake of electric vehicles. Lack of charging infrastructure can also impede non-residents plans to travel through North Dakota.

While it is yet to be seen how fast consumers in North Dakota adopt this technology, as it faces challenges in a cold northern climate and a large rural population, it could be a larger percentage of electricity consumption in the future. This belief has led the LEC to fund a study to examine impacts on demand and transmission that can be attributed to electric vehicles over the next five-10 years We are committed to ensuring policy makers have the best data possible to facilitate the best policies possible.

To provide the PSC with insight on behalf of the lignite industry in North Dakota, LEC submits the following responses to the public questions:

- 1. Whether ownership of electric vehicle charging stations should be permitted by regulated utilities. If permitted, under what conditions?** LEC believes that EV charging stations should be allowed by regulated utilities similar to how it is done in neighboring states. Regulated utilities already have established infrastructure in place that could be leveraged to keep recovery costs low for adding charging stations. Rules allowing for either utility, or third-party ownership, of charging infrastructure should be thoughtfully crafted to maintain the

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ability for flexibility and innovative growth in the industry while avoiding unintentional consequences or inefficiencies.

Answers to questions #2-5 are best left to public utilities and related stakeholders to respond to, although we note that our above-referenced study on the impacts of electric vehicles on demand may be useful to this rulemaking in the future.

Thank you for the opportunity to provide comments.

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