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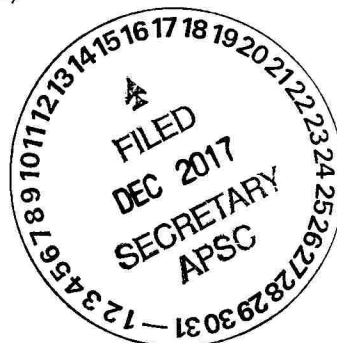
BUSINESS COUNCIL
OF ALABAMA

December 15, 2017

Alabama Public Service Commission
RSA Union Building
100 North Union Street, Suite 850
Montgomery, Alabama 36130

Attention: Mr. Walter L. Thomas, Jr.
Secretary

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



Dear Commissioners:

On behalf of the Business Council of Alabama ("BCA"), please accept the following comments in response to the order of the Commission in this proceeding. The BCA is a non-partisan, statewide business association representing the interests and concerns of nearly 1 million working Alabamians through its member companies and its partnership with the Chamber of Commerce Association of Alabama. The BCA is Alabama's exclusive affiliate to the U.S. Chamber of Commerce and the National Association of Manufacturers. While the BCA's membership includes many of Alabama's largest companies, including more than 1,300 manufacturers, 85 percent of BCA members are small businesses. BCA member businesses, which employ Alabama citizens in all 67 counties, are vitally affected by regulatory changes that impact business dealings in the state.

Alabama's automotive manufacturing industry continues to enjoy strong success, and the BCA has long advanced and supported constructive policies at both the state and federal levels to ensure we avoid obvious roadblocks to the industry's future success. In recent years, the BCA has also focused on the need for Alabama leaders to pursue intelligent strategies that will help our state improve its degraded transportation infrastructure that if not addressed could seriously disrupt future economic growth.

The Commission's interest in its jurisdiction over electric vehicle charging stations lands squarely at the intersection of these two very important issues. By all accounts, every major automaker sees electric vehicles featuring significantly, if not predominantly, in their future fleets. In an example specific to Alabama, Mercedes-Benz recently announced

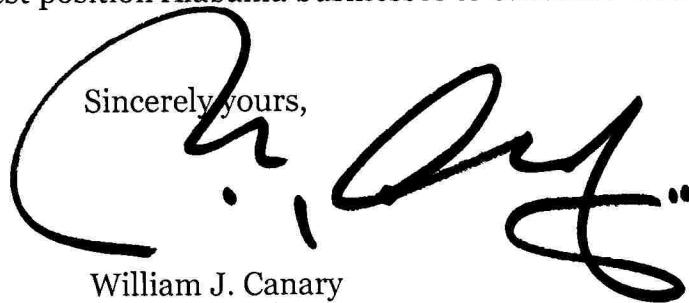
a \$1 billion investment in its facilities near Tuscaloosa for items including electric vehicle and battery development. All who are familiar with electric vehicle adoption will agree, however, that charging-infrastructure inadequacies remain a key impediment to increased demand for the technology. Additionally, adequate infrastructure is necessary for the growth of other, nascent areas of advanced mobility services, such as car-sharing, ride-hailing, and autonomous vehicles.

Alabama needs to take all steps possible to ensure that both existing and future industries understand that we are "Open for Business." The Commission can greatly help in this respect by ensuring that any action it takes in this proceeding does not frustrate the goals of our state's industry leaders. For example, the BCA does not see how operation of a charging station would cause a business to warrant the regulatory oversight the Commission currently applies to existing utilities such as Alabama Power Company or Spire. In fact, the mere prospect of such regulation could discourage business entities (including our state's automakers) from venturing into the vehicle-charging sphere in efforts to further vehicle electrification.

The Commission could also lend support to these sectors through the support of programs by Alabama Power. In more mature electric vehicle markets, the electric utility companies are playing a fundamental role in the planning and deployment of strategic charging infrastructure. This seems in large part a function of the companies' familiarity with the electric infrastructure and ways that charging infrastructure can be most cost-effectively integrated. Additionally, electric companies are uniquely positioned to educate consumers in efforts to raise awareness of electric vehicles.

The BCA welcomes further opportunities to provide its views on this important issue and answer any questions the Commission might have on how it can work with the BCA and other leaders in our state to best position Alabama businesses to succeed. Thank you for your consideration.

Sincerely yours,

A handwritten signature in black ink, appearing to read "W. J. Canary". The signature is fluid and cursive, with a large initial "W" and a stylized "C" at the end.

William J. Canary
President and CEO