



December 14, 2017

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



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

Secretary Thomas,

Manufacture Alabama is the only trade association in the state dedicated exclusively to the competitive, legislative, regulatory and operational interests and needs of manufacturers and their partner industries and businesses. Our mission is to create a business and political climate that promotes a positive, competitive environment and enhances the opportunity for growth of Alabama manufacturers. Our goal is to make Alabama the best business and political location in the United States for manufacturers. With this in mind, we submit the following comments in response to the order of the Alabama Public Service Commission in this proceeding seeking input on various matters concerning electric vehicle supply equipment.

Alabama is home to more than 5,200 manufacturing, assembly and processing establishments that employ more than 312,000 people and export \$8.3 billion in products and services. A significant segment of these operations is the automotive manufacturing industry, led in the state by Honda, Hyundai and Mercedes. Each of these has announced plans for the production of electric vehicles, and the ongoing presence of these automakers in Alabama positions the state to play an important role in their future plans. Case in point is Mercedes' decision to invest \$1 billion in its Alabama operations to further its vehicle electrification efforts.

The APSC does not need to inject uncertainty into these developments by trying to assert jurisdiction over electric vehicle supply equipment. The existing laws provide no indication in our view that the Legislature intended or expects the Commission to regulate such operators as utilities. While the focus of automakers on this sector has significantly increased in recent years, electric and hybrid vehicles have been around for a number of years, and during that time, electric vehicle supply equipment has popped up across the state. Manufacture Alabama knows

of no effort by the APSC to regulate these operations, or any indication by existing electric companies that the APSC should regulate these operations.

To the extent the APSC determines to enter this sector of industry, the APSC should work to develop constructive programs that assist the state's automotive industry and bolsters our economy. Such efforts would be in step with the historic approaches of the APSC to promote state economic development and job growth through policy initiatives designed around the services of the regulated companies. For example, the APSC might consider what it can do to facilitate the effective and strategic deployment of infrastructure. In other states, the electric utility companies are playing a big role here, through targeted investment, incentive programs and education, and it seems appropriate and expected that Alabama Power Company would be uniquely positioned to pursue similar efforts.

Manufacture Alabama thanks the APSC for its consideration of these comments. The success of Alabama's manufacturers depends on smart policy that advances the competitiveness of our industries. Unneeded regulation does not serve that end. We encourage the APSC to hold these principles in mind as it addresses the topic presented in this policy initiative and determines how next to proceed.

Sincerely,



George N. Clark
President, Manufacture Alabama