

July 23, 2022

Idaho Department of Transportation
NEVI Program Coordinator
Submitted via email to info@evidaho.org

Subject: IPM&CSA comments to the Idaho Department of Transportation regarding the National Electric Vehicle Infrastructure (NEVI) Program in Idaho.

The Idaho Petroleum Marketers & Convenience Store Association (IPM&CSA) appreciates the opportunity to provide comments on Idaho's NEVI program being coordinated by the Idaho Department of Transportation in conjunction with the Idaho Department of Environmental Quality and the Idaho Office of Energy and Mineral Resources.

Nationally, the convenience and fuel retailers sell over 80% of the motor fuels in the United States at approximately 116,000 locations. Our industry is well-positioned to provide the energy needs of future drivers – regardless of the energy source.

IPM&CSA represents the convenience and fuel retailing industry in Idaho, includes members from every region of the Gem State and serves communities from Sandpoint to Soda Springs. Idaho has more than 800* convenience stores employing more than 13,000* individuals. Idaho's C-stores serve Idahoans with nearly a million transactions every day, totaling \$3 billion* in sales of food, merchandise, and fuel. Petroleum marketers move 1.3 billion gallons of fuel and collect and remit to the State of Idaho \$369 million in fuel tax annually. Idaho convenience stores collect more than \$730 million* in taxes.

IPM&CSA members are vital partners to the state of Idaho and serve an important role for Idaho citizens. As such, we offer the following comments and recommendations as Idaho prepares to implement NEVI:

General Guidance for Policy Makers:

- Convenience and fuel retailers want to provide drivers with whatever fuel power their vehicles.
- Our industry is in a unique position to provide consumers the ability to charge their electric vehicles at our stores due to our desirable location for drivers and the fact that we are in every city and county in Idaho. We have convenient locations in underserved rural and in urban areas that will be key to transportation energy in the future.
- To promote the broadest adoption of EVs, Idaho should support private sector investment and a competitive private market for EV charging.

- EV charging should be an open, competitive market. Convenience and fuel retailers should have the option to sell any legal source of transportation energy in a competitive market with a level playing field.
- The state should partner with the private sector to incentivize charging infrastructure and build a competitive private market for EV charging. This will result in the largest possible expansion of, and investment in, EV charging -and it will keep prices low and competitive for EV drivers.
- The current electricity market is outdated and ill-equipped to handle a competitive EV charging market. The competitive forces that govern the liquid fuel marketplace benefit the consumer and should be a model for the EV charging infrastructure. Removing barriers to private sector investment, is imperative to the long-term development of the EV charging market.

Recommendations on Key Legislative & Regulatory Issues:

- EV Charging Stations – Support a level playing field. No ratepayer subsidies
- Equal Taxation & Treatment – EVs must be taxed and regulated exactly the same as all other motor vehicles and motor fuels, including but not limited to diesel, gasoline, CNG, LNG, hydrogen and propane.
- Utilities & Government should not be allowed to compete in the free market against private sector motor fuel producers and retailers.
- No Ratepayer Involvement. Idaho ratepayers should not pay for or subsidize, either directly or indirectly, any portion of any EV charging station, including electricity, lines, infrastructure, construction, land or ongoing costs.
- Finally, the Idaho Legislature Should Set Public Policy. This important and far-reaching public policy issue – which will directly impact the economy, taxpayers, utility ratepayers, consumers and the private sector retail motor fuel industry – should be determined by elected officials who are accountable to Idaho voters. EV policy should not be set by unelected and unaccountable regulatory bodies or administrative agencies.

IPM&CSA is proud to represent the industry that keeps Idaho supplied with food and fuel 24/7. Especially in Idaho's rural areas, C-Stores are often the only source of essential supplies for many miles. Our members will continue to do their part to keeping Idaho moving, and to provide goods, services and safety to Idahoans in every corner of the state.

We appreciate the opportunity to provide our input as the NEVI program rolls out in Idaho.

Sincerely,

Suzanne Budge
Executive Director, IPM&CSA

*NACS State of the Industry Report of 2020 Data; Nielsen TDLinX Store Count (December 31, 2020)