

STATE OF IOWA
BEFORE THE IOWA UTILITIES BOARD

IN RE:)	
)	DOCKET NO. RMU-2018-0100
ELECTRIC VEHICLE)	
INFRASTRUCTURE)	
)	COMMENTS
)	
)	
)	

The Environmental Law & Policy Center (ELPC) and Iowa Environmental Council (IEC) file these comments pursuant to the Iowa Utilities Board’s Order Requesting Stakeholder Comment on Potential Rule Changes issued February 6, 2019.

ELPC and IEC support the Board’s proposal to include a new rule to clarify that EV charging stations do not fall under the definition of public utility under Iowa Code § 476.1, and therefore are not subject to the exclusive service territories under § 476.25. We agree with the Board’s underlying rationale and conclusions that EV charging from a commercial charging station involves much more than simply selling electricity. We also support the rule addressing the resale issue in order to make clear that EV charging would still comply with electric tariffs that prohibit resale.

ELPC and IEC note that IPL’s Electric Tariff, Substitute Third Revised Sheet No. 221 (filed Sept. 12, 2017) is inconsistent with the Board’s proposed rule. The proposed rule requires compliance with the utility’s filed tariff, and until IPL’s tariff is revised, that tariff will create an unnecessary barrier to the development of EV charging infrastructure. ELPC and IEC urge the Board to require the necessary tariff revisions as soon as possible after finalizing the rule.

DATE: March 7, 2019

Respectfully submitted,

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