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Electric Vehicle (EV) Charging Facilities Technical Advisory Group (TAG)

Dear Members of the EV Charging Facilities TAG,

The National Federation of Independent Business (NFIB) represents over 10,000 members in every industry and every corner of Minnesota. We promote and protect the right of our members to own, operate, and grow their businesses.

Our members are generally very small businesses, with the average NFIB member employing 10 people and earning \$500,000 in gross annual revenue. Even seemingly minor added expenses are significant to them.

Therefore, NFIB respectfully requests the EV Charging Facilities TAG to consider the following recommendations from our small business members:

- In Table 8.9.2 of “Electric Vehicle Charging Scoping & Technical Criteria,” clarify that the “50+ spaces” and “20+ spaces” thresholds for commercial and multifamily occupancies means that facilities with fewer than 50 spaces are exempt from the “EVSE-Installed spaces” requirement and extend that exemption to the minimum “EV-Ready spaces” and “EV-capable spaces” prescribed in the table.
- To avoid an overly burdensome financial obligation on small businesses, include an administrative avenue for owners of covered occupancies to petition for an exemption based on one or more of the following criteria: (i) the total cost to purchase and install the chargers, (ii) the inability to contract with a third party charging company who is willing to own and operate the facilities, or (iii) other mitigating factors as deemed appropriate by the commissioner.
- To avoid the unnecessary overbuilding of EV facilities in certain areas, establish a target ratio of existing EVs to existing EV charging facilities within a county or other

reasonable geographic area.¹ Exempt covered occupancies from the mandate in areas where the ratio meets or exceeds the threshold.

Electric vehicle charging stations are not only expensive to purchase and install, but they are also costly to maintain. The U.S. Department of Energy estimates annual maintenance costs of \$400 per Level I or II charging station.^{2,3} The annual cost of maintenance via warranty for a DC fast charging station can cost over \$800 per charger per year.

These costs add up quickly for small business owners and we appreciate your consideration of the financial impact this proposal will have on them.

Sincerely,



John L. Reynolds
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¹ By one U.S. Department of Transportation (USDOT) estimate, the necessary ratio of Level II charging plugs per 1,000 plug-in electric vehicles (PEVs) is 36 in cities, 54 in towns, and 79 in rural areas. The necessary ratio of DC fast charging plugs per 1,000 PEVs is 1.5 in cities, 2.2 in towns, and 3.1 in rural areas. The estimate is based on 20% of new light duty vehicle sales being electric by 2030. USDOT, "National Plug-In Electric Vehicle Infrastructure Analysis," September 2017, https://www.energy.gov/sites/default/files/2017/09/f36/NationalPlugInElectricVehicleInfrastructureAnalysis_Sept2017.pdf

² According to USDOT, a single port Level II EVSE unit costs up to \$6,500, plus up to \$12,500 for installation costs. DC chargers can cost up to \$40,000, plus an additional \$51,000 for installation. Electric service line and other infrastructure upgrades can raise the total even further. USDOT Intelligent Transportation Systems Joint Program Office, "Non-Residential Electric Vehicle Charging Station Costs," 3/26/2019, <https://www.itskrs.its.dot.gov/its/benecost.nsf/ID/55617f7960284c85852583bd004963f6>

³ U.S. Department of Energy Alternative Fuels Data Center, "Charging Infrastructure Operation and Maintenance," accessed 8/30/2023, https://afdc.energy.gov/fuels/electricity_infrastructure_maintenance_and_operation.html