

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Investigation Required
by S.B. 275, Energy Amendments, Addressing
Cleaner Air through the Enhanced use of
Alternative Fuel Vehicles

DOCKET NO. 13-057-02

Initial Comments of Enterprise Rent-A- Car

Because electric vehicles provide air quality and economic benefits to the Wasatch Front and the state of Utah, policies that encourage their adoption should be considered.

As a business that operates numerous car rental locations throughout Utah, Enterprise Rent-A-Car supports any policies that address Cleaner Air through the Enhanced use of Alternative Fuel Vehicles. Just like any other vehicle, if EVs do not meet the needs of the American public — whether due to economics, serviceability, availability, or usability — they won't be accepted in the open market. The infrastructure for EVs and EV technology is rapidly improving, but it needs to continue advancing to meet the transportation requirements of society and overcome concerns related to driving range and recharging time. Incorporating EVs into our car rental and car-sharing fleet is another example of how we use our fleet to help new, clean technologies prove themselves in the marketplace.

With a more expansive network of Electric Vehicle charging stations along the Wasatch Front and throughout Utah, Enterprise Rent-A-Car could consider offering EV options for customers for business use, personal use and replacement use in our fleet. The biggest challenge to a sustainable EV car rental program is consumer range anxiety: the fear that there will not be enough charging stations available where they are needed to get to a desired destination. Policies that expand the network of charging stations will give EV drivers the confidence to take longer trips and give more people the confidence to purchase and/or rent an electric vehicle.

As a new transportation technology, EVs will have to overcome a number of barriers to gain widespread adoption. One of the greatest barriers to EV adoption is the upfront capital cost. Savings from reduced fuel costs will offset the higher purchase prices over the normal lifetime of a vehicle, however in a business case, the length of time that a company would own the car generally would not be as long as that of a personally owned vehicle, thus the savings are not realized.

Some key policy initiatives that could be considered in Utah to promote the adoption of electric vehicles and maximize the potential benefits are:

- Allow the commercial resale of electricity for vehicle charging, without invoking Commission regulation, to facilitate the availability of public charging stations;
- Create an EV electricity rate tariff unconnected to current tiered rates that will incentivize off-peak charging, without penalizing higher levels of electricity consumption;
- Bring parity to the tax credit for electric vehicles and natural gas vehicles (currently set at \$605 for electric vehicles and \$2,500 for natural gas vehicles);
- Create electric vehicle (EV) ready requirements in building codes, requiring that new garages and parking lots have conduit available for EV charging stations;
- Implement an annual decal fee on electric vehicles, a portion of which will be used to pay a fair share of roadway infrastructure costs, and portion of which will be invested in providing publically available charging stations;
- Support adoption of EVs in government fleets when EVs are appropriate to the fleet 's needs and cost effective compared to a gasoline vehicle;
- Develop a strategic plan for deployment of EV charging, including direct current quick charging stations to address range anxiety; consider cooperative effort with neighboring states on interstate highways.

When it comes to bringing alternative-powered vehicles to the mass market, the car rental industry is a critical link in the transportation value chain.

Thank you for considering these comments. Please direct questions about these comments to:

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