Statement of

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On Behalf of the

National Association of Convenience Stores (NACS)

And the

Society of Independent Gasoline Marketers of America (SIGMA)

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"Sharing the Road: Policy Implications of Electric and

Conventional Vehicles in the Years Ahead."

I. SUMMARY OF TESTIMONY

- Global Partners LP and other fuel retailers are consumer-facing entities that must continually adapt to changing consumer demands—and meeting those demands necessitates constantly changing the products and services they offer to the general public.

- As more electric vehicles continue to share the road with conventional vehicles in the years ahead, policymakers must consider several factors, including: (1) the environmental and energy independence implications of this shift, (2) the impact on marketplace competition, and (3) the impact on the nation's infrastructure.

- Policymakers should consider the overall impact of transitioning a substantial portion of the automobile fleet to electric vehicles as well as the impact on energy security and independence. This includes examining the "well to wheels" cost and impact of electric vehicles, taking into account power plant energy generation all the way to end-of-life battery disposal or recycling. In addition, the transition from domestic energy to sources or technologies that rely on the importation of certain rare materials to build batteries should be considered.

- Of greatest significance to the fuels marketplace and American consumers, policymakers must consider the skewed incentives (e.g., tax and regulatory policy) for electric vehicles that may lead to an anti-competitive refueling marketplace. In particular, public utility companies should not be able to invest in electric or alternative fuel recharging infrastructure by using ratepayer funds. It is difficult for the private sector to compete with that investment structure. Certainly, we question the appropriateness of public utilities using electricity payments made by the majority of the population (many of whom do not drive electric vehicles) to fund both the recharging stations and the actual refueling of electric vehicles. If states permit them to do so, this will likely result in a monopoly on the provision of electric vehicle refueling that will negatively impact consumers in the long-term. In short, it would lead to a predominately government-run refueling program.

- Infrastructure concerns, including updating the power grid and the cost of maintaining the nation's roads and bridges must also be evaluated. In light of the retail fuel industry's experience providing price competitive services to consumers, we encourage Congress and the states to work with industry and other stakeholders to find ways to deploy electric charging infrastructure via the existing privately developed motor fuels infrastructure.

II. INTRODUCTION

Chairman Shimkus, Ranking Member Tonko, and Members of the Subcommittee, thank you for the opportunity to testify on the future policy implications of electric and conventional vehicles, including the relationship between electric vehicle ("EV") deployment and the liquid fuels marketplace. My name is Dylan Remley and I am Senior Vice President of Terminal Operations for Global Partners LP ("Global"). In addition to overseeing all operational aspects of Global's wholesale bulk storage

terminals, I also oversee our alternative energy efforts, which include a variety of potential initiatives such as EVs, battery backup, photovoltaic energy (solar), and alternative fuels.[1]

I am testifying today on behalf of the National Association of Convenience Stores ("NACS")[2] and the Society of Independent Gasoline Marketers of America ("SIGMA").[3] Members of NACS and SIGMA (hereinafter the "Associations"), including Global, account for approximately 80 percent of retail motor fuels sales in the United States.

The Associations' members are consumer-facing entities that constantly adapt to changing consumer demands, and are thus effective surrogates for consumers. It is important to remember that offering a product for sale does not guarantee that consumers will purchase it. Motorists do not purchase retailers' products because they are available for sale; retailers sell products because customers purchase them. Thus, fuel retailers will continue to invest in equipment to support liquid, renewable and alternative refueling if customers demand it and presuming a return on investment is possible.

With regard to liquid fuels, in the U.S., gasoline purchases account for about five percent of all consumer spending in a year. Retailers' competition for market share, along with certain market pricing realities, have made the U.S. fuels market one of the most competitive and transparent markets in the country. Consumers will often change where they buy gas to save just a few cents per gallon.[4]

As Congress, the Administration, and relevant industry stakeholders consider the future of the nation's transportation fleet and the fueling marketplace that supports American motorists, I am pleased to provide the Associations' perspective.

A. Background on the Fuel Retailing and Convenience Industry

In 2016, the fuel wholesaling and convenience industry employed more than 2.7 million workers and generated $549.9 billion in total sales, representing approximately 3 percent of U.S. Gross Domestic Product.[5] Of those sales, approximately $317 billion came from fuel sales alone. Because of the number of fuel and other transactions in which the industry engages, fuel retailers and marketers handle approximately one of every 30 dollars spent in the United States. Convenience stores serve about 160 million people per day—around half of the U.S. population—and the industry processes over 73 billion payment transactions per year. Nevertheless, the convenience store and fuel retail industry is truly an

[1] As Senior Vice President, I also develop and oversee Global's strategy and government relations. Prior to joining the wholesale side of Global's business, I served as Deputy General Counsel for Global's gasoline distribution and station operations group.

[2] NACS is an international trade association representing the convenience store industry with more than 2,100 retailer and 1,750 supplier members, the majority of whom are based in the United States.

[3] SIGMA represents a diverse membership of approximately 260 independent chain retailers and marketers of motor fuel.

[4] According to a 2017 NACS survey, 67% of consumers say they would drive five minutes out of their way to save 5 cents per gallon and 61% say that price is the most important factor in determining where they buy gas. See *How Consumers Behave at the Pump*, NACS, http://www.convenience.org/YourBusiness/FuelsCenter/Pages/How-Consumers-Behave-at-the-Pump.aspx#.Ws4QQS7wbb0.

[5] All data in section II.A comes from the NACS, State of the Industry Report (2016).

industry of small businesses. Approximately 63 percent of convenience store owners operate a single store.

The fuel wholesaling and convenience store market is one of the most competitive in the United States. Today, there are approximately 150,000 retail fueling facilities throughout the nation. The majority are owned by independent companies, whether single-store operators or regional chains, and each of these businesses have different approaches to how they buy and sell fuel. Less than 5 percent are owned and operated by the integrated oil companies.

B. About Global Partners LP

i. Overview

Founded in the 1930s as a small retail heating oil distributor, today Global is a midstream logistics and marketing master limited partnership engaged in the purchasing, selling, storing and logistics of transporting petroleum and related products, including gasoline and gasoline blendstocks (such as ethanol), distillates (such as home heating oil, diesel and kerosene), residual oil, renewable fuels, crude oil and propane.[6] We own, control or have access to one of the largest terminal networks of refined petroleum products and renewable fuels in Massachusetts, Maine, Connecticut, Vermont, New Hampshire, Rhode Island, New York, New Jersey and Pennsylvania (collectively, the "Northeast") with additional terminals in North Dakota and Oregon. Global is also one of the largest distributors of gasoline, distillates, residual oil and renewable fuels to wholesalers, retailers and commercial customers in the New England states and New York. In addition, Global is one of the largest independent owners, suppliers and operators of gasoline stations and convenience stores in these areas, with a portfolio of approximately 1,450 owned, leased and/or supplied locations in the Northeast, Maryland and Virginia. Of those 1,450 locations, we directly operate approximately 260 sites.

ii. Global & EVs

At Global, we believe that we have some of the best locations for the driving and motoring public to refuel vehicles. We have chosen our retail locations with care and we constantly strive to provide the best refueling services to consumers. If consumers want to refuel with electricity, as opposed to gasoline and diesel fuel, this means that we will strive to provide that service to our customers in the most efficient and convenient way possible. As with traditional liquid refueling, we want consumers to stop at our stores not only to refuel, but to generate foot traffic in the stores. We want our sites to be convenient for the public to access and to provide them with the services they want and need.

With that in mind, Global is actively analyzing and considering investments in alternative energy efforts, including EV recharging. Most recently, we partnered with Electrify America to install EV charging stations in one of our stores.[7] While this will be Global's first foray into EV recharging at

[6] Global Partners LP is a publicly traded master limited partnership.

[7] Samantha Oller, *Casey's, Sheetz and Alltown Charge Up with Electrify America,* CSP News (Apr. 24, 2018), http://www.cspdailynews.com/fuels-news-prices-analysis/fuels-news/articles/casey-s-sheetz-and-alltown-charge-electrify-america?utm_source=Marketing%20Cloud&utm_medium=email&utm_campaign=CSP_Fuels_05-01-2018&sfmc_s=1601627.

retail, we continue to explore options with other EV providers. The reason Global is looking into EV recharging is simple: we are striving to meet the ever-changing needs of our customer base.

That being said, we do have concerns with the way some states are trying to expand the EV market by having public utility companies sell electric refueling in an anti-competitive and anti-consumer manner.

The Associations' concerns are expressed in further detail below.

III. ELECTRIC & CONVENTIONAL VEHICLES – POLICY CONSIDERATIONS

A. The Environment and National Security

Many studies have been conducted on the impact of conventional internal combustion engine vehicles on the environment, which have resulted in the passage of laws and the enactment of regulations to promote air quality controls and renewable fuels. Now, many are pushing for the widespread adoption of the so-called "zero emission vehicle," the plug-in or battery EV. The concept of a "zero emissions vehicle," however, is a misnomer.

EVs are powered by electricity generated at power plants across the country; approximately 63 percent of which is generated from three different fossil fuels: coal, natural gas, and petroleum.[8] This generation results in emissions. Further, the lack of a true well-to-wheels EV analysis is a cause for concern given the general desire of many policymakers to push EVs as the vehicle of the future. This is because available evidence shows that many factors impact the overall efficiency of EVs. For example, EV efficiency is affected by the geographic region where an EV is being used, which impacts the grid emissions profile of these vehicles among other factors. For instance, in many parts of the country, the electricity powering EVs is generated from coal, which has a vastly different emissions profile than hydropower. Other factors also impact the EV emissions profile including, but not limited to, driving patterns (e.g., highway vs. city driving) and climate (e.g., ambient temperature).[9] In short, the environmental benefits of EVs can vary significantly—and a hybrid or high efficiency internal combustion engine may be the more environmentally friendly option depending on the vehicle type and the place where it is being driven.[10]

Furthermore, while there has been some discussion of the environmental impact of batteries,[11] not enough attention has been paid to what happens to the batteries after an automobile reaches the end

[8] *See* U.S. Energy Information Administration (EIA), *Electricity in the United State is produced with diverse energy sources and technologies*, https://www.eia.gov/energyexplained/index.php?page=electricity_in_the_united_states; *see also* EIA, *FAQs: What is U.S. electricity generation by energy source?* (2017), https://www.eia.gov/tools/faqs/faq.php?id=427&t=3.

[9] "Temperature has an important effect on vehicle efficiency due to heating, ventilation, and air conditioning use and temperature-related battery efficiency effects." *See* Tugce Yuksel *et al*, *Environ. Res. Lett.* 2016, 11-044007, at 4.

[10] *Id.*; *see also* Mili-Ann M. Tamayao *et al*, Environ. Sci. Technol. 2015, 49, 8844−8855.

[11] This includes the environmental impact of mining for the rare earth minerals used to construct the batteries.

of its life. How will batteries be recycled? Where will they be disposed if they cannot be recycled or after their recycled life comes to a close? Moving forward now and figuring out the battery conundrum later will not work or benefit the public. Similarly, it is not clear that we understand the potential health impacts related to battery disposal. These are important policy considerations that must be thoughtfully examined, analyzed, and concluded before moving forward with a massive investment in and shift of fueling infrastructure in the U.S.

It is also important for lawmakers to consider the energy security and independence questions surrounding EVs just as they considered those policy implications when enacting the Renewable Fuel Standard ("RFS").[12] Over the past decade, the U.S. has made significant strides to achieve energy independence and energy security. Not only is the nation expected to become the top producer of oil by 2020,[13] the U.S. has also severely limited its imports of crude oil and finished products from politically unstable nations, while simultaneously making strides to enhance overall vehicle efficiency and thus reduce domestic consumption of motor fuels. It seems counterproductive, therefore, for policymakers to immediately push to transition to electricity powered vehicles that will not only come at a significant cost in the form of energy distribution (i.e., infrastructure) but will rely on the importation of certain raw materials (i.e., heavy metals for batteries) from countries that may not be considered politically or economically stable. For instance, the batteries in EVs come from many materials, including lithium, manganese, nickel, cobalt, and graphite, among others, which are mined in many different countries across North America, South America, Africa, Asia, and Southeast Asia.[14]

B. The Importance of the Private Marketplace for Vehicle Refueling

The Associations' members are consumer-facing businesses and are constantly adapting to changing consumer demands. Fuel retailers will continue to invest in equipment to support renewable and alternative fuels, whether it is biofuels, compressed natural gas, or electricity, if our customers demand it—and presuming a return on investment is possible.

The single greatest concern that many of the Associations' members have with the push to transition to EVs arises from efforts by state public utility companies to enter the alternative fuel

[12] Energy Policy Act of 2005, Pub. L. No. 109-58, 119 Stat. 594 (2005); Energy Independence and Security Act, Pub. L. No. 110-140, 121 Stat. 1492 (2007). The RFS was designed to: (1) enhance the energy security and independence of the United States by displacing petroleum products from unstable sources with renewable fuels, and (2) increase the use of renewable fuels that have more favorable emissions characteristics than traditional petroleum-based products.

[13] Osamu Tsukimori, *U.S. to overtake Russia as top oil producer by 2019 at latest: IEA*, Reuters (Feb. 26, 2018), https://www.reuters.com/article/us-energy-iea/u-s-to-overtake-russia-as-top-oil-producer-by-2019-at-latest-iea-idUSKCN1GB0C6.

[14] Henry Sanderson, *Electric vehicle ambitions spark race for raw materials*, Financial Times (Oct. 23, 2017), https://www.ft.com/content/44af43da-a1d6-11e7-8d56-98a09be71849; *See also*, Jeff Desjardins, *Here are the raw materials we need to fuel the electric car boom*, Business Insider (Oct. 27, 2016), http://www.businessinsider.com/materials-needed-to-fuel-electric-car-boom-2016-10 (noting that many of these minerals come from South America, Asia, Southeast Asia, and Africa. In fact, 65% of all cobalt production comes from the politically unstable Democratic Republic of Congo); *see also* James Stafford, *A New Lithium War Is About To Begin*, Oilprice.com (Apr. 24, 2018), https://oilprice.com/Energy/Energy-General/A-New-Lithium-War-Is-About-To-Begin.html; *see also* Chris Reiter and Christoph Rauwald, *VW Just Gave Tesla a $25 Billion Battery Shock*, Bloomberg News (Mar. 13, 2018), https://www.bloomberg.com/news/articles/2018-03-13/vw-secures-25-billion-battery-supplies-in-electric-car-surge.

recharging space with an unfair market advantage. To be clear, we have no problems with a public utility company entering the electric fuel recharging business *provided* it is competing for that business on equal footing with the private sector. As previously mentioned, Global has partnered with and is actively seeking additional partners in the EV refueling space.

Today, many states effectively grant utility companies a monopoly over the provision of electricity in a particular marketplace. In exchange for the loss of market freedom, utility companies are guaranteed a rate of return from ratepayers. Moreover, in many instances, utility companies can even recover their investment costs if those costs are included in the rate base. This model stands in stark contrast to most industries in the U.S., including the retail fuels industry, where robust competition propels the industry towards greater efficiency, diversified options, and greater price competition for consumers.

Recently, utility companies have sought approval to enter the EV recharging business *and* treat their capital investments in that business as part of the utility rate base that all of their customers must pay. This is very troubling. The private sector cannot compete with zero market entry costs. Thus, when states and their public utility commissions ("PUCs") permit these investment plans to go forward, they are essentially surrendering to those utilities a monopoly on the service of EV refueling. Such monopolies undercut the competitive nature of the refueling marketplace, ultimately harming consumers by disincentivizing efficiency (a natural byproduct of competition) and leading to increased costs to refuel.

Over the past few years, utility companies have filed large complex rate cases with PUCs seeking approval to spread in some individual instances upwards of $75 million dollars across the rate base. Moreover, since January 2018, "utilities in over 30 states, recognizing an opportunity to improve their returns with minimal risk to their shareholders, have received approval for or proposed programs to increase EV adoption within their service territories."[15]

If states want to encourage the development of EV infrastructure, they should do so. In fact, the Associations' members look forward to participating in the development of future EV refueling. However, this should <u>not</u> be undertaken at the price of granting a monopoly to public utilities. Any special incentives a state provides to a public utility should be provided to all market participants on an equal footing. Otherwise, the private market will not be able to compete with a quasi-government entity that is entering the marketplace with a significant economic advantage. If the private sector cannot compete, the private sector's ability and desire to invest in the alternative fuel marketplace will be limited. This, in turn, will result in fewer refueling options and less marketplace competition, which is generally bad for consumers as less market competition tends to lead to higher prices.[16]

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[15] Kevin C. Conroy and Kelly Caiazzo, *Utility Use of Ratepayer Funds to Promote Electric Vehicles* (Jan. 2018), prepared for the Society of Independent Gasoline Marketers of America (SIGMA). *See also* Colin Campbell, *Maryland's utilities propose spending $104 million on statewide electric-vehicle charging network*, The Baltimore Sun (Mar. 26, 2018), http://www.baltimoresun.com/business/bs-md-electric-vehicles-20180322-story.html; Mark Williams, *Ohio Regulators Green-Light Utility's $10M Plan to Install More EV Charging Stations*, The Columbus Dispatch (Apr. 26, 2018), http://www.govtech.com/fs/transportation/Ohio-Regulators-Green-Light-Utilitys-10M-Plan-to-Install-More-EV-Charging-Stations.html.

[16] From a policy perspective, it is also important to consider whether investment incentives for government-run enterprises are appropriately aligned as they are in the private sector. For instance, government-run enterprises may under-invest in some

Utility companies have both regulated and unregulated parts of their business. If those companies would like to invest in electric charging infrastructure via their unregulated subsidiaries that must compete with the private sector on a level playing field, that would be perfectly fine. Those companies should not, however, be able to fund investment in alternative refueling and the cost of the product itself on the backs of ratepayers. Not only are retailers unable to compete against ratepayer backed investment, it is also inappropriate for utility companies and states to be regressively funding electric recharging infrastructure on the backs of ratepayers – the vast majority of whom do not drive EVs. Under the typical utility structure, people, who pay for electricity to heat and light their homes, are subsidizing refueling for individuals who are able to pay at least $50,000 per EV after taking into account the federal EV tax credit.[17] Further, fuel retailers are significant ratepayers – *utilities are retailers' third largest operating expense*[18] – so in paying for their own utility bill, retailers are funding their competitors and paying for their former customers to refuel their vehicles with "free" electricity.[19] The unequal playing field that is quietly being established in the EV space raises serious concerns for lawmakers and a troubling competitive imbalance for fuel retailers and American consumers.[20]

C. Infrastructure

The concerns enumerated above relating to marketplace investment in EV refueling bring us to the last major policy area: infrastructure.[21] Considerable energy is necessary to power EVs,[22] and this

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areas and over-invest in others—they are unlikely to have the most convenient locations and the most consumer-friendly operations (e.g., hours of operations, customer culture, etc.)—all of the things that private businesses must invest in and constantly improve in order to survive.

[17] There are currently 23 EV models available for sale in the U.S. with a weighted average retail price of $51,500 after the federal tax credit of $7,500. "Electric Vehicle Outlook 2017," Bloomberg New Energy Finance (July 6, 2017) at 11. This average price for an EV is significantly below the cost of some of the available models (e.g., 2019 BMW i8 Roadstar MSRP $163,300; 2019 Jaguar I-PACE S – MSRP $69,500).

In addition, a study by Pacific Research Institute found that 79 percent of the EV tax credits were taken by consumers with annual household incomes greater than $100,000 per year, and households with $50,000 per year or more made up 99 percent of EV tax credits. *See* Jon LeSage, *The Biggest Challenge in Electric Car Markets* (Apr. 29, 2018), Oilprice.com, https://oilprice.com/Alternative-Energy/Renewable-Energy/The-Biggest-Challenge-In-Electric-Car-Markets.html.

[18] Utility expenses, which include electricity, are retailers' third largest operating expense. NACS, State of the Industry Survey Data from 2017.

[19] Today, it appears that the predominant model used with regards to EV refueling is to give electricity away at the meter. Nevertheless, there are different pricing schemes being implemented on the ground, including parking rental, dwell time charging, etc.

[20] And of course, costs (such as the cost of the electricity for vehicle refueling) will evolve and change over time. Retailers obtain electricity from public utilities. Thus, if at some point in the future, retailers are competing with public utilities for consumer electric refueling business, they must be protected from a public utility charging them (as their competitor in the refueling space) a higher price for the refueling commodity (i.e., electricity). There may come a time when public utilities must be required to charge their competitors (i.e., retailers with EV refueling locations) a price for electricity which is no higher than the price at which they transfer power to their own refueling locations.

[21] It is also important to consider how a transition to EV powered vehicles would impact citizens during natural disasters when the electric grid is shutdown.

will place a strain on the existing power grid, particularly during peak hours.[23] For example, research conducted at the National Renewable Energy Laboratory in Colorado found that "a high concentration of adoption [of EVs] in specific neighborhoods" can "significantly increase the peak demand seen by distribution transformers" and can "require upgrades to the electricity distribution infrastructure."[24] Grid strain and grid support are complex questions that will need to be addressed at the state level—and upgrades to the electric power grid will take money.

In addition to the necessary upgrades to the nation's power grid, lawmakers also must consider the impact of battery-heavy EVs on our roads. Unlike conventional vehicles, which support infrastructure investment because their owners pay the gas tax, EV owners use the country's roads without paying the taxes that support its maintenance and development. This is particularly concerning at a time when the Highway Trust Fund is low on funds and our nation's roads and bridges are falling apart. According to a Goldman Sachs analysis, EV adoption would drastically reduce that amount of government revenue that comes from the gas tax.[25] Thus, we encourage lawmakers to consider the impact of EVs on infrastructure revenue and investment because drivers of conventional vehicles should not be the only ones shouldering the infrastructure burden.

IV. CONCLUSION

To sum up, fuel retailers must constantly adapt to meet consumer demand—and today that means we must consider how to provide services to customers driving not only conventional vehicles, but also EVs. Given the prime location of retail fueling stores, the highly competitive nature of the industry, and the wealth of experience in refueling, we believe that the fuel retailing industry is well-positioned to meet consumer needs as EVs continue to enter the marketplace. However, we urge lawmakers to examine the many factors, which I have highlighted above, that accompany such a transition.

See The 2017 Hurricane Season: A Review of Emergency Response and Energy Infrastructure Recovery Efforts: Hearing before the Committee on Energy and Commerce, House, 115th Cong. (2017) (Testimony of Max E. McBrayer) https://www.govinfo.gov/content/pkg/CHRG-115hhrg28115/pdf/CHRG-115hhrg28115.pdf.

[22] Bloomberg New Energy Finance, *Electric Vehicle Outlook 2017*, (July 6, 2017) at 3, *available at* https://data.bloomberglp.com/bnef/sites/14/2017/07/BNEF_EVO_2017_ExecutiveSummary.pdf (noting that "Electricity consumption from EVs will rise to 1,800TWh by 2040 from 6TWh in 2016. While this represents just 5% of our projected global power consumption in 2040, the 'peakiness' of fast-charging load profiles will need to be managed by utilities and regulators through the introduction of time-of-use rates to encourage off-peak charging, as well as storage solutions at the operator site which can mitigate high power demand from the grid.").

[23] Nick Stockton, *Electric cars could destroy the electric grid – or fix it forever*, Wired.com (Feb. 03, 2018) https://www.wired.com/story/electric-cars-impact-electric-grid/.

[24] Megan Geuss, *How many electric cars can the grid take? Depends on your neighborhood*, Ars Technica (Jan. 23, 2018), https://arstechnica.com/cars/2018/01/how-many-electric-cars-can-the-grid-take-depends-on-your-neighborhood/ (referring to the study by Matteo Muratory looking at uncoordinated EV adoption across neighborhoods).

[25] Tom Kloza, Oil Price Information Service (OPIS), *Goldman: EVs Represent Big Help for Big Oil* (Mar. 27, 2018). Presentation. NACS State of the Industry Summit.

In particular, the Associations exhort lawmakers to ensure that EV recharging and infrastructure investment is done through the private sector and on a level playing field so that tax and other incentives are not provided to certain stakeholders and not others. To do otherwise risks granting a de facto monopoly on the provision of refueling services and making them quasi-government entities, which will likely lead to inefficiencies and an increase in costs for consumers in the long-term. In contrast, the current private retail fuels marketplace, which developed over decades, developed by responding to consumer demand.

Congress and states should work with the convenience store industry and other potentially affected parties to find ways to deploy an electric charging infrastructure using the existing privately developed motor fuels infrastructure in order to ensure local businesses that have made investments in their properties are not negatively impacted by federal or state plans to support alternative fueling locations.

Thank you for the opportunity to testify before you today, I am happy to answer any questions you may have.