



# TESTIMONY

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## HOUSE BILL 1511: PROHIBITING UNFUNDED MANDATES FOR ELECTRIC VEHICLE CHARGERS

*By Avery Frank*

Testimony Before the House Government Efficiency  
and Downsizing Committee

### TO THE HONORABLE MEMBERS OF THIS COMMITTEE

Thank you for the opportunity to testify. My name is Avery Frank. I am a policy analyst at the Show-Me Institute, a nonprofit, nonpartisan, Missouri-based think tank that advances sensible, well-researched, free-market solutions to state and local policy issues. The ideas presented here are my own and are offered in consideration of unfunded electric vehicle (EV) charging station mandates that have been put in place by numerous governments<sup>1</sup> in the St. Louis area.<sup>2</sup>

The growth of the EV market has captured the attention of consumers and investors in recent years. However, it remains true that only one percent of cars on the road in

the United States are fully electric. Even further, of the 310,000 electric vehicles sold in 2021, 110,000 of those were sold in California alone.<sup>3</sup> As this data indicates, this market is in its early stages. Local governments, however, have started to impose mandates for EV chargers on private property owners and businesses without any indication that there is a need for government intervention.

HB 1511 would protect business owners in the St. Louis area from being forced to bear the cost of installing, operating, and maintaining EV charging stations out of their own pockets by current and future St. Louis-area mandates. While such protections are a step in the right direction, the protection should be extended to all business and property owners statewide.

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## GENERAL ISSUES WITH TRYING TO MANIPULATE THE TRANSPORTATION MARKET

With the EV market still in its early stages of development, there are two key things to consider:

1. Governments are assuming that the EVs of the present are also the vehicles of the future. In an industry that is innovating<sup>4</sup> as rapidly as EVs, this is shortsighted. It is possible, perhaps even likely, that entirely different technology, such as hydrogen-fuel cells,<sup>5</sup> will emerge and make the charging stations of today obsolete.
2. Electric vehicle charger technology is also in its early stages.<sup>6</sup> A level 2 (L2) charger—currently the most common type of city public charger—can charge an EV from empty to 80 percent of capacity in 4 to 10 hours.<sup>7</sup> As charging technology evolves, faster options will become available, but they may or not be compatible with charging stations being built today. Mandating early-stage chargers now could make costly retrofitting necessary in the future.

## THE EV MARKET WILL GROW AT ITS OWN PACE—UNFUNDED MANDATES HURT BUSINESS OWNERS

Numerous St. Louis governments, such as the City of St. Louis, St. Louis County, and Brentwood, have enacted EV-charging mandates in order to get infrastructure in place ahead of expected growth in the EV market. Such policies are both risky and unnecessary. As the EV market grows, restaurants, hotels, and other businesses will face economic decisions about whether to add charging stations to their premises in order to attract consumers. A barbershop with limited parking may not want to build an EV station as full parking lots can dissuade customers, but for a landlord or hotel-owner, an EV station could be beneficial for luring tenants or customers. The free market will determine how, and at what pace, the charging network expands as the number of electric vehicles on the road grows.

Importantly, forcing a business to bear the costs of installing an EV charging station (which, for an L2 charger, costs between \$2000 and \$5000)<sup>8</sup>—and also

of operating and maintaining it—could create a true hardship. HB 1511 would require governments in St. Louis County and the City of St. Louis to pay for the installation, operation, and maintenance of any charging stations that are created by their own mandate.

## FORCED RAPID EXPANSION OF EV CHARGING TECHNOLOGY IS UNNECESSARY

The concern about possible problems caused by a lack of public charging facilities is unfounded, as most EV owners rarely use public chargers. According to a 2022 survey<sup>9</sup> regarding public L2 chargers:

- Approximately 4 percent of EV owners report using a public charger daily
- Approximately 14 percent of EV owners use one weekly
- Approximately 16 percent use one monthly
- Approximately 46 percent of EV owners say they “rarely” use a public L2 charger
- Approximately 21 percent say they have never used one

In summary, 67 percent of all EV owners say they rarely or have never used a public L2 charger.<sup>10</sup> This is hardly surprising; one of the conveniences of EVs is that one can charge them at home, and over 90 percent of EV owners charge their car at home<sup>11</sup> daily (55%) or weekly (38%).

## HB 1511 SHOULD APPLY TO THE ENTIRE STATE

While the St. Louis area has made headlines with unfunded mandates, other municipalities across the state can enact similar ones. The provisions of HB 1511 restrict its effect only to the City of St. Louis and St. Louis County. Local EV charging mandates are unnecessary and harmful intrusions by governments into this evolving industry, regardless of where in the state they are enacted. HB 1511 should expand its restrictions to the entire state.

## NOTES

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**5297 Washington Place · Saint Louis, MO 63108 · 314-454-0647**  
**1520 Clay Street · Suite B-6 · North Kansas City, MO 64116 · 816-561-1777**

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