



June 26, 2020

Mr. Brian Oakey
Idaho State Department of Agriculture
PO Box 7249
Boise, Idaho 83707

Via email: brian.oakey@isda.idaho.gov

RE: Northwest Grocery Association comments opposing DOCKET NO. 02-0214-2001 (NEW CHAPTER)
Rules for Weights and Measures IDAPA 02.02.14

Mr. Oakey:

The Northwest Grocery Association (NWGA) submits the below comments in response to the June 23 rulemaking meeting regarding changes to Weights & Measures IDAPA 02.02.14.

First, I'd like to express my thanks and regards for your presentation on June 23. It was clear, valuable information. Thank you for the work you and your team put into it.

NWGA is not opposed to an increase in fees, but we are opposed to an increase of this size, which amounts to 67 percent for the devices that most affect the grocery industry and our fuel centers.

Specifically:

- These new fees would result in a total of a 77 percent increase to the W&M budget. We feel that a 77 percent increase to the budget – particularly all at once – is extreme.
- We would prefer a more phased-in approach to the fee increases, rather than all of it occurring at once. We can support paying an increased fee in order to help ISDA build its reserve after the purchase of new equipment, but we would like to see it occur over a period of time, over three years at least, and be a more reasonable number than the 67% increase that applies to the two devices that affect the grocery industry most – Devices A and G.
- Our members already perform third-party audits of our scales and fuel pumps several times per year, and in the June 23 meeting, ISDA representatives acknowledged that much time is spent responding to complaints from the public. As such, we view the ISDA Weights & Measures program as an important service to the public, and therefore believe the split between General Fund and Dedicated Funds should be closer to 50/50. We understand that an increase in General Fund dollars is unlikely; which means the fee increases need to be reduced to bring the total to a more equal level.



- Finally, we would like more information on the need for a \$100 fee for commercial electric vehicle charging stations. The explanation provided in the June 23 meeting did not provide any precedent or other example of states that license and inspect these stations, and did not explain what equipment must be purchased or how much it costs. We would like further explanation of why the fee needs to be \$100. We will be opposed to the addition of these stations at this fee level without information from your team about how you arrived at \$100.

NWGA looks forward to working with Weights & Measures to find a more equitable and reasonable increase in fees that sustains this important program.

Sincerely,

Melinda Merrill
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