July 23, 2018

Kathleen H. Burgess
Secretary, Public Service Commission
3 Empire State Plaza
Albany, NY 12223-1350

RE: Joint Petition for Immediate and Long-Term Relief to Encourage Statewide Deployment of Direct Current Fast Charging Facilities for Electric Vehicles.

Ms. Burgess,

EVgo appreciates the opportunity to submit this letter of support in favor of the Joint Petition for Immediate and Long-Term Relief to Encourage Statewide Deployment of Direct Current Fast Charging Facilities for Electric Vehicles. Facilitating a viable operating cost structure is critical to the deployment of much-needed, widespread network of DC fast chargers in New York to enable mass adoption of electric vehicles (EVs). Accordingly, EVgo commends the Department of Public Service (DPS), New York Power Authority (NYPA), the New York State Energy Research and Development Authority (NYSERDA), and other key New York stakeholders for their work to date and strongly supports the Joint Petition under consideration by the Commission.

EVgo operates America’s largest public EV fast charging network, with over 1050 chargers in 66 metropolitan markets and 34 states. Primarily using Direct Current fast chargers (DCFCs) with a power rating of at least 50kW, EVgo fast charges more drivers for more miles than any public charging network in the nation. Our national charging network enabled more than 40 million zero emission miles for 70,000+ customers in 2017, and these figures continue to grow rapidly. Currently, we have approximately 25 fast chargers deployed in New York, with many more sites in the state and across the country either in planning phase, under construction, or coming online later this year. EVgo welcomes the opportunity to work closely with the state and key stakeholders to expand that infrastructure to enable mass adoption of EVs. Implementing rate structures such as those referenced in the Joint Petition will enable EVgo and other fast charger market participants to accelerate deployment in the state.

New York has ambitious goals for transportation electrification, requiring 800,000 total EVs by 2025. Coupled with its leadership on ZEV, New York has ambitious targets to reduce greenhouse gas emissions by 40% compared to 1990 levels. Transportation electrification will be critical to meeting these greenhouse gas reduction goals as evidenced by the 2015 State Energy Plan, which says that the “state’s climate goals cannot be achieved without a rapid transition to vehicles powered by electricity…”

Widespread EV infrastructure will be necessary to enable the transition to transportation electrification necessitated by the state’s ZEV and greenhouse gas reduction goals; yet, operating costs for this EV infrastructure, especially for fast chargers, remain a key barrier to widespread deployment. With demand charges representing highly variable percentages of the electricity costs per DC fast charger, the importance of rate reform cannot be underscored. EVgo currently sees demand charges ranging to upwards of 80% of a given site’s electricity bill. Existing rate structures are presently the largest operating cost barrier to EV infrastructure deployment, and without the rate reform referenced in the Joint Petition, New York will be challenged in meeting its ZEV and climate goals. Sensible rate reform will ensure that the public charging infrastructure needed can be deployed in an economically efficient way.

Public charging infrastructure is critical to making EVs accessible to New Yorkers across income levels and geographies, such as renters, multi-unit dwelling residents, and others without access to reliable garage parking to charge their vehicles. Increasingly, public charging is also an important use case for the gig economy, including rideshare as transportation network companies (TNCs) are a growing portion of vehicles on the road. With growing numbers of individuals opting to eschew personal vehicle ownership, TNCs will represent a growing share of vehicle miles traveled (VMT) for more and more New Yorkers. As a result, EVgo has been working closely with industry leaders on delivering fast charging services to ridesharing partners. Our experience piloting electric vehicles through Maven Gig, part of General Motors, and other TNCs demonstrates the business case for electrification of rideshare through lower total cost of ownership (TCO) than traditional internal combustion engine (ICE) vehicles. This is especially important to many of our customers who are TNCs.
drivers, often low-to-moderate income (LMI) consumers, driving upward of 50,000 miles per year.

In a CPUC report entitled *Electrifying the Ride-Sourcing Sector in California¹*, Lyft recently reported that most drivers on its Express Drive program have no access to home charging, which further points to the importance of fast-charging infrastructure to unlock TNC EV usage. Again referencing the *Electrifying the Ride-Sourcing Sector in California* report, the CPUC writes that exposure to EVs for both the public and TNC drivers “has been found to result in lasting positive impressions that influence subsequent vehicle purchase decisions.” Sixty-seven percent of drivers reported that passengers discussed the car’s EV technology at least once per work period, suggesting that the TNC sector can serve as a platform to expose passengers to EVs. In sum, as New York looks to wider spread deployment of EVs, fast charging is critical to reaching mass adoption and unlocking opportunities for EV exposure to not only renters and those without reliable access to home and workplace charging, but also for TNC drivers, other gig economy workers, and those New Yorkers who rely on gig economy workers’ VMT to commute to work. The rate reform proposed in the Joint Petition is necessary to enable widespread DCFC deployment to meet the needs of these EV drivers.

Rapid expansion of DCFC infrastructure is critical to the ability of New York to achieve its goals in transportation electrification. As such, EVgo strongly encourages the Commission to consider the Joint Petition, filed over three months prior to the July technical conference, expeditiously and on a separate and faster track than the generic EV proceeding. EVgo thanks the staff of both DPS and NYSERDA for providing the EVgo team with the opportunity to discuss fast charging at the technical conference, and for the opportunity to provide input on this rulemaking. Please do not hesitate to contact us if we can answer any additional questions or be of further assistance. We look forward to engaging with DPS and NYSERDA on these important infrastructure considerations to usher New York into a new era of transportation electrification.

Sincerely,

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