September 21, 2018

Honorable Kathleen H. Burgess
Secretary
New York State Department of Public Service
Three Empire State Plaza, 19th Floor
Albany, NY  12223

Re:   Case 18-E-0138 – Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure

Dear Secretary Burgess,

On August 16, 2018, the New York State Public Service Commission (“Commission”) issued a Notice of Working Group Meeting and Request for Post-Conference Comments (“August 2018 Notice”), which scheduled the next Working Group Meeting for September 21, 2018, and invited interested parties to submit comments in response to the technical conferences previously held on July 18, 2018 and July 19, 2018. In response to the August 2018 Notice, National Fuel Gas Distribution Corporation (“Distribution” or the “Company”) hereby submits these comments.

By way of background, Distribution has been an active participant in this proceeding, and the Company is looking forward to participating in today’s Working Group Meeting. The purpose of this letter is to note that the Company already filed comments in this proceeding on April 18, 2018 and July 20, 2018, and that Distribution encourages the Commission, Department of Public Service Staff (“Staff”) and interested parties to consider those comments as part of the record, and in conjunction with comments being filed in response to the Commission’s August 2018 Notice.

As the Company’s comments describe in greater detail, combined heat and power (“CHP”) applications could:

- improve charging station reliability, resiliency, utilization and economics;
- create new revenue streams for charging station operators;
- eliminate the need to add to or upgrade electric utility infrastructure;
- make meaningful contributions to New York State’s environmental and emissions goals;
- help reduce transmission losses from the bulk power system and increase energy efficiency; and
- ameliorate concerns surrounding electric utility rate design.

1 Case 18-E-0138 – Notice of Working Group Meeting and Request for Post-Conference Comments, issued August 16, 2018.
The Company is ready to work with charging station designers, operators, and other interested market actors, to demonstrate how natural gas and its positive benefits, can be a solution.

Distribution appreciates the opportunity to submit these comments in response to the August 2018 Notice. Any questions you may have regarding this filing can be directed to the undersigned at (716)-857-7440 or at crahene@natfuel.com.

Respectfully submitted,

Evan M. Crahen
Director
Rates and Regulatory Affairs
National Fuel Gas Distribution Corporation
6363 Main Street
Williamsville, NY 14221