April 18, 2018

Honorable Kathleen H. Burgess  
Secretary  
New York State Public Service Commission  
Three Empire State Plaza  
Albany, NY  12223

Re:  Case 18-E-0138 – In the Matter of Electric Vehicle Supply Equipment and Infrastructure

Dear Secretary Burgess,

    On February 21, 2018, a Petition was filed with the New York State Public Service Commission (“Commission”) in Case 14-M-0101, requesting that the Commission open a separate proceeding to advance New York’s electric vehicle market, and to solicit scalable pilot programs that can accelerate the growth of electric vehicle charging infrastructure, among other things (“February 2018 Petition”).¹

    National Fuel Gas Distribution Corporation (“Distribution” or the “Company”) respectfully submits this letter to note that the scope of the proposed, separate proceeding seems to be inconsistent with the Commission’s stated REV policy goal of “fuel and resource diversity.”²³ Should the Commission deem that a separate proceeding is necessary, Distribution proffers that the most efficient use of time and resources would be to institute a proceeding that addresses all aspects of the transportation sector contemporaneously. As an illustrative example, this type of proceeding could potentially consider strains that charging stations place on the electric grid, if sited in improper locations or areas without infrastructure. Alternatively, the Commission could potentially consider the environmental benefits of the enhanced use of natural gas vehicles (“NGV” or “NGVs”), as a complementary technology that can make meaningful contributions to the stated goals of the New York State Energy Plan.⁴

    Natural gas is the cleanest burning alternative transportation fuel available today that can economically power light, medium, and heavy-duty vehicle applications, as well as many non-road applications, such as rail and marine vehicles. Whether in the form of compressed natural gas (“CNG”) or liquefied natural gas (“LNG”), natural gas is a proven alternative fuel that significantly improves local air quality and reduces greenhouse gas emissions. Today, NGVs are delivering superior emissions compared to what was achievable just a few years ago. NGVs have been characterized by the United States Environmental Protection Agency (“EPA”) as the

³ Case 14-M-0101 – Order Adopting a Ratemaking and Utility Revenue Model Policy Framework, issued and effective May 19, 2016, at pages 111, 112 and Appendix A.
cleanest commercially available internal-combustion vehicles on the planet, and as such, the technology has received the American Council for An Energy-Efficient Economy’s (“ACEEE”) title of “Greenest Vehicle” for several years (including a span of eight consecutive awards). Compared to its gasoline-burning counterpart, recent NGV models produce lower emissions of non-methane hydrocarbons, NOx (which contributes to ozone depletion), and carbon monoxide.

Beyond light-duty passenger cars, there are many options to choose from when considering a NGV. Numerous manufacturers in the United States produce a variety of models of light, medium, and heavy duty NGVs and engines. These vehicles include refuse trucks, transit buses, shuttle vans, and a variety of vocational work trucks. These larger vehicles are often placed in service in fleets that consume a lot of fuel and accumulate more miles than the average consumer vehicle. This means these vehicles are reducing even more pollution than if they were used in applications that accumulate fewer miles and use less fuel.

In application, NGVs are also capable of running on a blend of natural gas and renewable fuels, such as: biogas, bio-methane, and renewable natural gas. In particular, renewable natural gas has several benefits, including but not limited to: significant reductions in greenhouse gas emissions, increased domestic energy production, improved waste management (including reductions in groundwater contamination and run-off into local waterways), new revenue sources for American farmers, and innovative domestic job creation opportunities that provide superior wages for all employees involved in the energy production supply chain. It is important to note that biomass applications are eligible to produce Tier 1 RECs for electric generation purposes, no differently than other renewable technologies.

Simply put, NGVs: positively impact the health of local economies; support state and national policy goals in a number of ways; advance environmental and emissions goals; improve business competitiveness by increasing energy efficiency and managing costs; create new jobs and business opportunities, while making energy more affordable for all New Yorkers; have transparent supply chains; and diversify energy supplies by enabling further integration of domestically produced and renewable fuels.

The Company appreciates the opportunity to submit this letter in response to the February 2018 Petition and the commencement of Case 18-E-0138. If you have any questions, or if you need any additional information, please contact me at your convenience.

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5 NYSERDA’s Tier 1 Eligibility and Certification Guidelines – publicly available at: https://www.nyserda.ny.gov/All-Programs/Programs/Clean-Energy-Standard/Renewable-Generators-and-Developers/RES-Tier-One-Eligibility/Eligibility.
6 The natural gas supply chain is transparent, domestic, and documented, unlike the supply chains of other fuels or technologies which are seemingly environmentally advantageous. This is further described in detail by The Washington Post: https://www.washingtonpost.com/graphics/business/batteries/congo-cobalt-mining-for-lithium-ion-battery/.
Respectfully yours,

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