September 21, 2018

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

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

Dear Secretary Burgess,

CALSTART is pleased to offer its comments following the July Technical Conference for Case 18-E-0138. CALSTART appreciates the opportunity to participate in this proceeding and to help shape the future of utility participation in the provision of electric vehicle charging infrastructure in New York.

I. Background

CALSTART is a national not-for-profit organization with a worldwide member base that presently consists of 195 firms, fleets, and agencies that are dedicated to supporting a growing high-tech, clean transportation industry that cleans the air, creates jobs, cuts imported oil and reduces global warming emissions. CALSTART provides services and consulting to spur advanced transportation technologies, fuels, systems and the companies that make them. CALSTART has offices located in California, Colorado, Michigan, and New York.

Of most direct relevance to Case 18-E-0138, CALSTART has years of experience as an intervenor in utility regulatory proceedings before the California Public Utilities Commission (CPUC) that ultimately have shaped the contours of utility involvement in developing crucially important charging infrastructure networks for electric vehicles (EVs). Recently, CALSTART was party to the CPUC proceeding prompted by California Senate Bill 350 (SB 350) that resulted in the largest approval of utility funding for investments in EV infrastructure, including approval for $579 million in utility expenditure on make-ready infrastructure and system upgrades to accommodate electrification of medium- and heavy-duty fleets.1 More recently, CALSTART has expanded its participation in the utility regulatory domain beyond California from both its Northeast and Midwest regional offices, engaging in incipient regulatory proceedings relating to the role of utilities in developing EV infrastructure networks in Maryland2 and Michigan.3 CALSTART is glad to be engaged in a similar set of discussions in New York and commends

1 http://www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=6442457607
2 https://www.psc.state.md.us/search-results/?keyword=9478&x.x=16&y.y=13&search=all&search=case
3 https://www.michigan.gov/mpsc/0,4639,7-159--271898--,00.html
the concerted efforts of the Public Service Commission and Department of Public Service to accelerate EV adoption across New York.

CALSTART has maintained a Northeast regional office in Brooklyn, NY since 2013. Since that time, CALSTART has specialized in administering programs that facilitate the adoption of cleaner, more efficient powertrain alternatives throughout the region. Most notably, CALSTART has administered the New York Truck Voucher Incentive Program (NYT-VIP)\(^4\) in partnership with the New York State Energy Research and Development Authority (NYSERDA) and New York State Department of Transportation (NYSDOT) since 2014. NYT-VIP is an upfront voucher incentive program designed to significantly reduce the incremental cost of an alternative-fuel, hybrid, or all-electric medium- and heavy-duty vehicle relative to a comparable conventional-fuel vehicle by up to 80 percent. Since the program’s inception, NYT-VIP has disbursed more than $14 million in incentive funds to facilitate the adoption of nearly 600 cleaner, more efficient trucks and buses in fleets throughout New York State, including $5.7 million toward the purchase of 65 all-electric trucks and buses. This program complements similar voucher incentive programs CALSTART administers in California (with approximately $95 million in truck vouchers disbursed to date)\(^5\) and Chicago (more than $11 million in truck vouchers disbursed to date)\(^6\).

In addition to market activation programs to integrate cleaner technologies into medium- and heavy-duty fleets, CALSTART also works in the Northeast to promoting the adoption of cleaner light-duty personal vehicles through a strategic incentive program called Charge to Work NY.\(^7\) This program aims to address a leading barrier to electric vehicle (EV) adoption in the greater New York City area—i.e., lack of predictable residential and publicly accessible charging infrastructure—by facilitating reliable access to electric vehicle supply equipment (EVSE) at workplaces. Charge to Work NY provides upfront rebates of $4,000 per Level 2 charging port and matching vehicle rebates of $500 for employees of participating workplaces to facilitate their purchase of an EV with the assurance of access to EV workplace charging.

Finally, CALSTART has played an active role in shaping cleaner transportation policy throughout the Northeast through its partnership with states in EPA Regions 1 and 2 (extending as far south as New Jersey and as far north as Maine) as an organizing partner in the Northeast Diesel

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\(^4\) For more information on NYT-VIP, including eligible vehicle models, qualified vendors, and implementation manuals, refer to https://truck-vip.ny.gov/

\(^5\) California’s Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP) (https://www.californiahvip.org/)

\(^6\) Drive Clean Chicago (http://www.drivecleanchicago.com/)

\(^7\) https://www.chargetoworkny.com/
Collaborative (NEDC). CALSTART’s NEDC leadership has manifest in the development of a Clean Freight Corridors Workgroup to promote conducive and uniform conditions for alternative-fuel and high-efficiency goods movement throughout the Northeast.

II. Responses to Questions Posed by the PSC

1. What role should the utility play in supporting Electric Vehicle Supply Equipment (EVSE) deployment? Please address this question from the perspective of utility ratepayers, Electric Vehicle (EV) suppliers, and providers of EVSE. How should utility investment costs, if any, be compensated or recovered? Should utilities have the opportunity for earnings adjustment mechanisms related to successful EVSE deployment?

Electric utilities have a crucially important role in supporting the provision of EVSE. Amid increasing reliance on self-generation from distributed energy resources (DERs), electric vehicles present an opportunity for utilities to stabilize load and dampen the potential for higher rates that can result from lower-than-forecast kilowatt-hour sales. Strategic deployments of EVSE coupled with shrewd rate designs have the potential to improve system utilization and induce additional downward pressure on rates by reducing the peakiness of an electric distribution system.

In addition, individual sites acting in isolation to add EVSE will not provide nearly the same overall benefit as utilities acting to coordinate aspects of these sites. Utilities are the common denominator in any EVSE site and can enhance the usefulness of any one site by helping it to conform with other nodes in an EVSE network, leveraging network effects to encourage greater rates of EV adoption. CALSTART encourages the Commission to consider that utilities have both an inherent interest in, and access to the means of providing, the kind of robust EVSE network needed to encourage desired levels of EV uptake.

From the ratepayer perspective, utility investments in EV infrastructure are justified by the reality that the social and environmental benefits of electric transportation do not accrue exclusively to those who own or drive in personal electric vehicles. Eliminating tailpipe emissions creates health benefits to those residents in the immediate vicinity of vehicle operations. In particular, local pollution (especially fine particulates) from trucks and buses exerts serious public health impacts on the populations in which they operate, with lower-income communities bearing a disproportionate burden. Because the benefits of displacing these emissions are shared throughout the region, utilities have both an inherent interest in, and access to the means of providing, the kind of robust EVSE network needed to encourage desired levels of EV uptake.

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8 https://northeastdiesel.org/
entire communities and help to address historical inequities in pollution burdens within those communities, utility rate-based investment to help facilitate the transition of vehicles to zero-emission technology is well justified. In fact, the rate base is perhaps the most effective policy tool to catalyze electrification to realize more of its benefits in the near term.

Beyond authorizing utility investment in EV infrastructure broadly, earnings adjustment mechanisms (EAMs) can be a useful near-term tool to align utility incentives with desired outcomes related to EV penetration. Importantly, and in the interest of advancing sound practice with respect to outcome-based incentives, DPS Staff and utilities should determine what the desired outcomes and metrics of interest are (e.g., number of EVSE installed in a service territory, number of EV registrations in a service territory) and then assess the nature of utility agency over that outcome. CALSTART welcomes the opportunity to help shape EV-related EAMs for New York utilities either as a part of or in addition to related efforts underway by individual utilities (e.g., Central Hudson’s environmentally beneficial electrification EAM and Con Edison’s DER utilization and GHG reduction EAMs).

2. What are the most significant changes the Commission can make in order to enhance the utilities’ roles in supporting EVSE deployment? What are the benefits and problems with utility ownership of EVSE?

It is important that the Commission take an active stance in this matter to initiate the type of transformative change needed to achieve the State’s Charge NY objectives of having 800,000 EVs on New York roads by 2025 and 10,000 EV chargers statewide by the end of 2021. These targets are extremely ambitious, particularly in light of current penetration rates, and demand proportionately aggressive action to ensure that the electricity system facilitates, rather than hinders, their achievement.

To this point, Case 18-E-0138 should assess utility processes for receiving, prioritizing, and executing service requests related to EV infrastructure. Currently there is no specialized treatment of these requests, but the nature of these requests in terms of commissioning capital-intensive equipment is not dissimilar to other types of service requests for which specialized policies and procedures exist. For instance, interconnections of distributed generation systems are governed by the Standardized Interconnection Requirements (SIR) and fulfilled by utilities’ dedicated distributed generation groups in the order in which they populate a dedicated distributed generation interconnection queues. Furthermore, these groups have DG ombudsmen to guide applicants through the interconnection process and help applicants to troubleshoot issues as they arise. To avoid lengthy lead times that can jeopardize investments in EVs, which in some instances are dependent on time-limited vehicle incentives, CALSTART recommends that utilities establish an EV ombudsman role (or its functional equivalent) along with
dedicated interconnection queues for EVSE requests along with guidelines developed in concert with industry actors to set out minimum expectations for timing and responsiveness as prospective EVSE hosts seek to add this new specialized load.

Apart from process improvements, the most significant change the Commission can introduce to enhance the utility role in EVSE deployment is to recognize the enormous benefit of electrifying medium- and heavy-duty transportation. Because of the disproportionate impact of truck and bus traffic on public health, the electrification of these fleets is of critical importance for all ratepayers from public health and environmental justice perspectives. That said, heavier vehicles have greater power and energy demands and are frequently charged in depot-style configurations. This charging configuration has impacts for both rate design (largely because of potentially high demand charges) as well as on the allocation of costs incurred to provide sufficient electrical service to those facilities.

While Case 18-E-0138 is discussing rate design as its first order of business, CALSTART believes it to be of vital importance to deal with the potential for significant facility service upgrades to add to the upfront cost barrier to adoption. A May 2018 decision by the CPUC sought to address this barrier by authorizing a combined $579 million for Pacific Gas & Electric (PG&E) and Southern California Edison (SCE) to perform make-ready installations to support electrification of roughly 15,000 medium- and heavy-duty vehicles statewide. CALSTART urges the Commission to consider similar treatment for utility investment in make-ready infrastructure for commercial vehicle fleets in order to remove this critical barrier to EV adoption for fleets that by and large currently run on diesel. Extending support to electrification of medium- and heavy-duty vehicles should not wait until investments in light-duty electrification have been implemented.

Regarding utility ownership of EVSE, CALSTART takes no position. With levels of EVSE penetration and EV adoption still low in New York, particularly relative to ambitious policy targets, there is ample room for experimentation throughout New York State to reveal the right mix of EVSE ownership between utilities and other market actors, as well as to shed light on how that mix might change with time as the business case for EV charging matures further. At this stage of EV adoption, it is at least clear that utilities have a critical role to play in providing service to EVSE (if not further), and the cost recovery guidelines developed under this case should reflect that imperative.

3. What role should the utility play in encouraging EV adoption? Should the role of the utility extend beyond customer education and awareness? Please

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10 See supra at 9
address this question from the perspective of utility ratepayers, EV suppliers, and providers of EVSE. How should utility costs, if any, be compensated or recovered?

The primary area of need that utilities can address to encourage EV adoption in New York is to ease adoption of charging infrastructure in various settings—residential, non-residential (e.g., fleet), and public. New York State already has robust programs in place to incent adoption of EVs, including the Drive Clean Rebate and the New York Truck Voucher Incentive Program, but potential EV adopters’ ability to provide infrastructure to support and enable utilization of these vehicle incentives remains uncertain. Utility-supported incentive programs to facilitate the purchase and installation of EVSE would therefore be an effective complement to New York’s existing vehicle incentives.

Beyond such programs, utilities are well positioned to improve the economics of EV ownership through price signals. Con Edison’s Smart Charge NY program is a terrific example of additional savings EV drivers can access by voluntarily charging in a more grid-beneficial manner during off-peak hours. Proactive programs like these to align driver behaviors with grid needs should be explored statewide both to stimulate additional EV adoption and to mitigate adverse impacts of this additional load.

4. What is the best way for utilities, charging station providers, and site hosts to work together to locate charging stations where they best meet electric system, customer, and community needs? What data is needed to further this collaboration?

Consistent with our response to Question 2 above, CALSTART believes it to be of critical importance that utilities be able to support electrification of commercial vehicle fleets and to do so without assigning untenable costs to those fleets. Utilities are uniquely suited to characterize system conditions across their service territories to provide high-level information to prospective site hosts and EVSE providers on the capacity for distribution nodes to support large new loads. As such, an effort analogous to the hosting capacity maps developed and published by the Joint Utilities as part of the Distributed System Implementation Plan (DSIP) process would be a welcome tool for market participants to make more informed investment decisions. Just as these hosting capacity maps provide information on where a distribution system can support significant injections from distributed generation sources, an analogous load map could provide detail on where the same system can accommodate load additions of a certain size most

readily (or at least cost). Once constructed, such a map could be combined with additional information that can help expedite development in a more cost-efficient manner, including overlaying the locations of fleets and warehouses to see which are in more accommodating locations on the distribution grid.

5. Are there any communities or customer groups that require special consideration in the placement of EVSE facilities? What role should the utility play in encouraging or facilitating increased EV usage by low- to moderate-income households?

CALSTART sees value to addressing the public DC fast charging use case as an important area of need to encourage significantly higher levels of mass-market EV adoption. A use case that may look similar on the surface but in fact differs in important ways is that of commercial vehicle fleet electrification. Fleets with several or many medium-to-heavy-duty vehicles would likely need to rely on large amounts of Level 2 charging infrastructure in a depot-style charging configuration in order to electrify their fleets. As with public DC fast charge hubs, such a configuration will likely trigger higher demand charges under current rate structures, which could deter fleets from making a transition away from petroleum-based fuels. CALSTART encourages the Commission to provide dedicated treatment to this use case classification (see Question 13) to better understand how utility policy can influence their decision-making to use electricity as their major fuel supply.

Regarding extending benefits of EV usage to low- to moderate-income (LMI) households, there are several approaches that can be employed to increase exposure of LMI communities to the benefits of electric transportation. While LMI individuals characteristically have less disposable income than other consumers, they have higher rates of transit ridership and are more likely to be disproportionately impacted by diesel emissions from trucks and buses. Accordingly, electrifying transit buses is an important initiative to ensure an equitable distribution of electrification benefits and to more completely justify an active role for utilities and the use of the utility bill as the financing mechanism, as described above in Question 1.

6. What rules, requirements, and standards are needed to enable EVs and EVSE to operate as a source of grid services and system value, including possible data and instrumentation needs?

There should not be restrictions on metering that require EV customers to install additional revenue-grade meters to distinguish EV load from other load. As above, Smart Charge NY offers a good blueprint in this regard through its use of a FleetCarma device that plugs into the onboard diagnostic

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port of an EV to monitor and transit vehicle and charging data without requiring further metering. Furthermore, Con Edison not only provides this device to program participants at no cost but pays them to activate it. Similarly, additional opportunities for customers to provide grid services and system value should be compensated as such and should not be subject to upfront cost hurdles if they can be avoided or offered by the utility as an added incentive to participate.

7. What are the barriers to treating EVs and EVSE as Distributed Energy Resources (DERs)? How does rate design affect the ability of EVs and EVSE to provide this value? How does rate design affect the extent to which the value provided by EVs and EVSE (including environmental and economic benefits) is compensated?

At this moment the largest barrier to treating EVs and EVSE as DERs is the lack of a mechanism for compensating their benefits as such. New York has made great strides in enumerating technologies and services eligible to receive compensation for benefits conferred to the distribution system through the Value of Distributed Energy Resources (VDER) proceeding (Case 17-E-0751).

Current rules would require pairing EVSE with stationary energy storage to be eligible to receive any compensation under VDER. However, because there will likely be many more standalone EVSE sites than those paired with stationary storage, to fully treat EVs and EVSE as DERs will require rules under which to compensate them for grid services, whether energy injections (i.e., vehicle-to-grid technology), demand response, or ancillary services that the mobile batteries EVs house can provide.

8. Should EVs and EVSE be treated as DERs? If so, what factors need to be addressed to include EVs and EVSE within the DER market and compensation structure for DERs?

CALSTART offers no response to this question.

9. What considerations should be taken into account in designing rates for charging stations? For example, should a typical three-part tariff (customer, demand and energy charge) be applied? Should the rate design be different for residential versus commercial use? Should the rate design be expected to change over time as EV penetration increases? Should time-of-use rates be required for EV charging? Should utility residential EV charging tariffs (filed in Case 18-E-0206) be modified? Please address these questions from the perspective of utility ratepayers, EV owners, and EVSE suppliers.

At this stage of EV adoption in New York, it is difficult to be prescriptive regarding an optimal rate design. While best practice suggests that EV customers are reasonably responsive to TOU rates and this makes EV
adoption more financially sustainable for utilities, we don’t yet know what tools will work best in New York, nor in what combination. There is ample room for experimentation and a diversity of demographics, development densities, car ownership patterns, and other factors to support informative investigation.

CALSTART offers that this investigation should be in service of the objective of making electricity competitive on a dollar-per-mile basis with petroleum-based fuels for as many prospective EV customers as possible. In this light, it is important to recognize distinctions between customer use cases; for instance, while a temporary demand charge moratorium may be a good solution for the public DC fast charging use case (i.e., charging revenues grow with utilization over time and could be sufficient to accommodate demand charges once reintroduced), it is not necessarily a sustainable solution in the commercial vehicle fleet charging use case. These fleets would benefit from a near-term relaxation of demand charges but are generally not raising revenue with their chargers with which to offset the reintroduction of demand charges. These customers therefore require greater experimentation with the other portions of the utility bill, including the energy and potentially customer charges, which along with demand charges ultimately constitute the fueling cost for an electric fleet. CALSTART’s experience in California suggests that a menu of rate options, including several TOU options, will best support fleet electrification while also encouraging fleets to charge during lower-cost hours.

CALSTART encourages Staff and the Commission to encourage utilities to perform a series of EV rate design pilots that assess various permutations of charges (customer, energy, and demand) as well as TOU structures (opt-in vs. opt-out, peak/off-peak vs. more granular) to more effectively reveal what best stimulates EV uptake among various customer classes.

10. How should the cost of recovering distribution network upgrades for EVSE be recovered if not through the demand charges?

As described above in Question 2, the public policy benefits of displacing diesel emissions from trucks and buses justify the investment of ratepayer dollars in supporting cleaner solutions. The broader benefits of large-scale EV penetration are especially striking and have been estimated by MJ Bradley and Associates to be nearly $18 billion by 2050 for New York State alone. The recent CPUC decision cited above to authorize more than $600 million in utility make-ready investment for DC fast chargers ($22.4 million for PG&E) and medium- and heavy-duty vehicle electrification ($236 million for PG&E, $343 million for SCE) provides compelling precedent that another

13 https://mjbradley.com/sites/default/files/NY_PEV_CB_Analysis_FINAL.pdf
leading progressive state believes these types of make-ready investments, even at largest-ever levels, to be well justified.\textsuperscript{14}

Not only will an active utility role in providing the make-ready and/or upstream infrastructure required to serve new EV loads help to accelerate the EV market in light-, medium-, and heavy-duty segments, but it will also pay back to the tune of billions of dollars in net benefits in the coming decades.

11. In designing EV and EVSE programs, how can the Commission ensure compatibility with ongoing regional initiatives, programs offered in other states, and potential private investment?

Northeast states are fortunate to generally share a long-range policy vision, and especially so with respect to clean transportation and climate mitigation. Collaborative groups including Northeast States for Coordinated Air Use Management (NESCAUM), the Transportation and Climate Initiative (TCI), the Regional Greenhouse Gas Initiative (RGGI), the Zero-Emission Vehicle (ZEV) Alliance, and the Northeast Diesel Collaborative (NEDC) all provide forums for Northeast and Mid-Atlantic states to share best practices, learn from one another, and ultimately to instill greater uniformity region-wide to amplify successes. CALSTART encourages the Commission and New York utilities to engage meaningfully with their counterparts through the above-named forums to learn how other states in the region are grappling with similar issues as those raised in this comment opportunity and to share the latest in New York’s thinking so that its leadership on this issue can be demonstrated on the regional stage.

12. Should the Commission address electrifying light-duty passenger vehicles, and medium and heavy-duty vehicles within this Case?

Having made the decision to open a targeted proceeding on EVSE and EV infrastructure, it is imperative that the Commission use this opportunity to establish tenable solutions for electrification of all vehicle classes. First and foremost, drastically reducing fossil fuel emissions from mobile sources is vital to the realization of New York State’s climate goals, and these emissions do not stop with light-duty vehicles. Secondly, the emissions from medium- and heavy-duty vehicles tend to be more noxious than those from light-duty vehicles, the result of diesel fuel and producing far more nitrogen oxides and particulate matter than gasoline-powered cars, making it especially important from a public health perspective to curb diesel emissions even if they do not constitute the lion’s share of transportation GHG emissions (for instance, only around 16 percent of transportation

\textsuperscript{14} See supra at 1
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emissions in NYC come from medium- and heavy-duty vehicles\(^{15}\). Finally, as mentioned above, a coordinated program of utility support for light-through heavy-duty EVs will complement available New York state incentives for all vehicle classes, including the Drive Clean Rebate for light-duty EVs and NYT-VIP’s voucher incentives for medium- and heavy-duty EVs (among other cleaner-fuel alternatives). While this approach may require more effort, constraining utility investment to any fewer than all types of EVs will leave unclaimed benefits on the table.

13. How should Staff structure future stakeholder engagement in this proceeding? Should additional issue-specific working groups be held prior to Staff issuing recommendations?

CALSTART appreciates the focused discussion of September 21, 2018 on rate design considerations for the public DC fast charging use case. To continue constructive momentum for a medium-term engagement, CALSTART recommends that the Commission and Staff utilize the next meeting of Case 18-E-0138 to catalogue EV use cases as a means to begin framing the remainder of the proceeding, which should be time-limited but sufficiently comprehensive to address utility-related barriers to the most important types of EV adoption.

As a starting point, CALSTART suggests the following as use-case-focused focus areas, which could form the basis of subsequent meetings or working groups:

- Mass-market (light-duty private-use passenger cars): these vehicles rely principally on private charging but benefit from public charging as assurance for range anxiety;
- Transportation network companies (TNCs): these vehicles require robust networks of dedicated or public-access DC fast charging;
- Commercial fleets: these vehicles typically demand greater levels of energy and power but can charge over longer periods, typically relying on private Level 2 charging at depots or less frequently higher-power en-route configurations.

14. Any other issues that stakeholders wish to raise.

CALSTART wishes to share a few observations from that session for the purpose of framing future discussions in this proceeding. Two important threads emerged as priority considerations during the Technical Conference. One was utilization: utilities want to ensure that ratepayer contributions are prudent and have the best chance of producing ratepayer benefits, and private EVSE providers need to earn a positive return on their

\(^{15}\) See [https://www1.nyc.gov/assets/sustainability/downloads/pdf/publications/GHG%20Inventory%20Report%20Emission%20Year%202016.pdf](https://www1.nyc.gov/assets/sustainability/downloads/pdf/publications/GHG%20Inventory%20Report%20Emission%20Year%202016.pdf) at 10
investments. In light of both considerations, parties converged on the point of emphasizing EVSE placements in settings most conducive to high utilization or putting conditions in place to optimize utilization of existing sites.

The other important thread was equity. Environmental advocates were careful to point out that New York’s efforts to encourage electric transportation would not be successful if the benefits only accrue to the wealthiest New Yorkers. With that said, an emphasis on high-utilization locations, which is likely to orient siting decisions to areas with greater income levels and car ownership rates, may be incompatible with equity priorities.

CALSTART suggests that it is of vital importance to reconcile the two critical themes of utilization and equity, and offers that strategic partnerships with high-mileage vehicle fleets is a way to advance both objectives in tandem rather than setting them at odds. For instance, carshare and TNC fleets both operate for much more of available hours than do private vehicles, so agreements with these vehicle fleets can provide robust baseload utilization for charging infrastructure investments. At the same time, partnerships with these companies and local or State entities could help ensure that the electric mobility services they offer are accessible and affordable for the populations that might otherwise be underserved. Los Angeles Department of Transportation’s BlueLA program,16 which provides all-electric carshare service with an emphasis on disadvantaged communities, provides a model of how a public-private partnership can establish such a program to extend EV access into LMI communities with vehicles that provide high utilization for the chargers installed as part of the program.

We look forward to working with the Commission, utilities, and other stakeholders to develop forward-thinking business models that emphasize these priorities and stretch the benefits of transportation electrification the furthest they can reach.

16 https://www.bluela.com/about-bluela
III. Conclusion

CALSTART appreciates the opportunity the above responses to the Commission’s thoughtful questions and pledges to remain engaged throughout this proceeding to advance New York’s clean transportation and climate objectives.

Respectfully submitted,

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