STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Proceeding on Motion of the Commission Regarding
Electric Vehicle Supply Equipment and Infrastructure

Case 18-E-0138

Pace Energy and Climate Center, Acadia Center, Association for Energy Affordability,
Mobility Development Partners, Natural Resources Defense Council, and the Sierra Club

September 21, 2018
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Comments to the New York State Department of Public Service Regarding Electrified Transportation Shared Mobility Solutions for Low-Income and Underserved Communities

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Pace Energy and Climate Center, Acadia Center, Association for Energy Affordability, Mobility Development Partners, Natural Resources Defense Council, and the Sierra Club, collectively, the “Aligned Parties,” appreciate the opportunity to submit these comments in response to the Department of Public Service Staff’s (“Staff”) request for comments following the July and 19, 2018 public conferences in the instant proceeding.¹ The Aligned Parties specifically address questions 1, 2, 3, 5, and 13 of the notice soliciting comments.

As New York builds upon its efforts to meet its transportation electrification goals, it is critically important that the state consider, and develop, mechanisms for expanding electric vehicle (“EV”) access to New Yorkers who have thus far been underserved by the EV market. In particular, low-income, underserved, and under-resourced communities must have access to and the opportunity to benefit from electrified transportation. These benefits include transit, environmental, and economic development, among others. The Aligned Parties applaud the New York Public Service Commission’s (the “Commission”) initiative in launching this docket and

¹ Case 18-E-0138, Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure, Notice of Working Group Meeting and Request for Post-Conference Comments (August 16, 2018).
other related EV efforts, and look forward to working with Department of Public Service Staff (“Staff”) and other stakeholders to ensure an equitable build-out of New York’s EV market.2

On February 21, 2018, Sierra Club, Natural Resources Defense Council, and 39 other groups, including signatories to the instant comments, filed a Petition for an Order Establishing a Separate Proceeding to Advance New York’s Electric Vehicle Market,3 requesting that the Commission establish a docket to consider a number of issues relating to the role of New York’s electric investor-owned utilities in accelerating transportation electrification in a manner consistent with state climate and Zero Emissions Vehicle targets. On April 24, 2018, the Commission initiated the instant docket “to consider the role of electric utilities in providing infrastructure and rate design to accommodate the needs and electricity demand of EVs and EVSE,”4 and to consider a number of specific issues, such as the “potential utility roles in supporting” electric vehicle supply equipment (“EVSE”) deployment, the “potential utility roles in encouraging EV adoption,” “compatibility with ongoing regional initiatives and other state’s programs,” and “other similar actions proposed by stakeholders.”5

New York must consider the question of equitable access to sustainable transportation as it aims to achieve its ambitious electric vehicle targets under the multistate Zero Emissions Vehicle Memorandum of Understanding.6 Electrified transportation offers a number of potential “co-benefits” beyond supporting New York’s EV goals, including reduced air pollution and

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2 The Aligned Parties also support the responses to Staff’s questions filed by Natural Resources Defense Council, Sierra Club, and other parties in this docket on September 21, 2018.
4 Case 18-E-0138, Proceeding on Motion of the Commission Regarding Electric Vehicle Supply and Infrastructure, Order Instituting Proceeding (April 24, 2018), at p. 3.
5 Id at p. 4-5.
additional transit resources for the host communities. In addition to addressing the needs related to enabling and facilitating personal EV ownership, which can be cost- or lifestyle-prohibitive for some New York residents, it is imperative to complement current EV market development efforts with transportation electrification solutions for residents who do not have access to personal vehicles. Both single-passenger EVs and EVs deployed through shared mobility programs are essential to meeting New York’s climate and zero-emissions vehicle goals.

Low-income New Yorkers and others who are not in a position to directly invest in single-passenger vehicles could access EV markets through “shared mobility” programs. As used in these comments, “shared mobility” refers to a range of transit programs that focus on shared use of vehicles, including car share, ride share, and microtransit programs. Because many low-income New Yorkers live in transit-constrained, environmental justice, or underserved communities, they also face the dual challenges of heightened local air emissions and a lack of sufficient local transportation options. Electrified shared mobility programs can be especially beneficial in such communities, as they can improve local air quality and residents’ access to jobs, medical services, and other critical resources. In addition, charging infrastructure installed to serve shared mobility systems can also serve electrified medium- and heavy-duty vehicles, which are a major source of local air pollution and attendant adverse health effects.7

In recent years, a number of municipalities across the U.S. have recognized the importance of extending electrified transportation to low-income communities through shared mobility programs. For example, in Los Angeles, CA, the BlueLA program, one of the largest

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7 Electrification of public transit can also benefit residents of low-income communities through reductions in harmful diesel pollutant emissions and increased access to electric transportation for those residents that do not drive personal vehicles. MTA recently announced a commitment to electrify its entire bus fleet by 2040. See https://insideclimatenews.org/news/26042018/nyc-air-pollution-electric-bus-public-transportation-mta-clean-technology.
shared mobility programs in the country, will deploy 40 stations of 100 EVs and 200 charge points across low-income communities in central LA when it is fully operational.\textsuperscript{8} Low-income residents can qualify\textsuperscript{9} for program discounts, including 80% off the membership fee, 25% off the usage fee, and more.\textsuperscript{10} The program is a public-private partnership between California state agencies, a private company, the local utility, and a non-profit administrator,\textsuperscript{11} and community-based organizations engaged in helping to connect to the community and solicit feedback on program implementation and outreach.\textsuperscript{12}

The BlueLA program was launched in April 2018, and the program has not yet undergone a full evaluation of successes and challenges. However, the program is expected to produce a number of benefits, including a reduction in greenhouse gas emissions of approximately 2,150 metric tons of carbon dioxide, and to result in the sale or avoided purchase of approximately 1,000 private vehicles.\textsuperscript{13}

BlueLA is an example of a shared mobility program deployed in a dense urban environment. As an example of a rural program, the Green Raiteros program in Huron, California serves a very rural part of the state—mostly farming communities—where residents

\textsuperscript{8} See, https://www.bluela.com/.
\textsuperscript{9} Customers can demonstrate eligibility for the discounted Community Membership through several methods, including proof of gross annual income or proof of enrollment in a variety of assistance programs, such as the Low Income Home Energy Assistance Program, Federal Public Housing Assistance, and Temporary Assistance for Needy Families, among others. For the full list, see BlueLA, Community Membership Eligibility, https://www.bluela.com/community-membership-eligibility.
\textsuperscript{10} BlueLA, Community Membership Eligibility, https://www.bluela.com/community-membership-eligibility.
\textsuperscript{11} Program partners include Blue Solutions, a subsidiary of the Boloré Group, the California Air Resources Board, the Los Angeles Department of Water and Power, and the Shared Use Mobility Center. Joe Linton, LADOT And BlueLA Partner For Low-Income Electric Car Share, StreetsBlog LA (June 9, 2017), http://la.streetsblog.org/2017/06/09/ladot-and-bluela-partner-for-low-income-electric-car-share/.
\textsuperscript{13} Shared Mobility Use Center, BlueLA Electric Carsharing Service Launches (April 20, 2018), http://sharedusemobilitycenter.org/news/bluela-electric-carsharing-service-launches/.
have transit options for reaching medical care, jobs, and other critical services.\textsuperscript{14} Through the Green Raiteros, the City of Huron is providing electric vehicles to be used as part of an existing ride share program that has been serving the community for many years. Customers call a dispatcher and request a ride, and pay a small fee based on the distance. The program includes charging stations, which are funded by the California Public Utilities Commission, placed in strategic locations.\textsuperscript{15}

The BlueLA and Green Raiteros programs exemplify the fact that shared mobility programs have a wide range of designs, based on the needs of the local community, financing arrangements, and other considerations. In New York, as in other jurisdictions, shared mobility programs may take different forms in the dense urban environments downstate versus more suburban and rural environments upstate. However, programs do generally include some common elements. For example, those that are designed to serve low-income communities typically offer some form of subscription and/or discount for income-qualifying customers, which can make them more challenging to finance. In addition, shared mobility programs that feature electric vehicles face the additional cost of charging infrastructure—typically one of the most expensive components of the program.

As a result, shared mobility programs that deploy electric vehicles as the transit resource sometimes partner with the local utility for the charging infrastructure component of the program. Given the lack of EV market engagement in serving low- and moderate-income communities, utilities can be helpful partners in extending the opportunity to use, and benefit

\textsuperscript{15} Id.
from, electrified transportation to communities that have thus far been underserved by the EV market.

In regard to future stakeholder engagement in this proceeding, the Aligned Parties recommend that, to the extent there are additional technical forums or other discussion opportunities, Staff include sessions focused on underserved communities, a review of existing shared mobility programs serving low-income customers in New York, useful examples from other jurisdictions, and the potential role of New York’s utilities in expanding shared mobility and other low-income community EV programs in the state.

The Aligned Parties look forward to working with Department of Public Service Staff and other stakeholders to develop a pathway for enabling such programs across the state and to consider the role of New York’s utilities in supporting program development.