

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

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

**SUPPORT FOR THE INITIATION OF A PROCEEDING AND INTERIM MEASURES  
ADDRESSING ELECTRIC VEHICLE SUPPLY EQUIPMENT AND  
INFRASTRUCTURE FOR MEDIUM- AND HEAVY-DUTY ELECTRIC VEHICLES**

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**Introduction**

PZEVF is a growing coalition of stakeholders from across the transportation sector united by a commitment to minimize transportation emissions and support the adoption of medium- and heavy-duty zero-emission vehicles (ZEVs). The manufacturers, purchasers and users of ZEV trucks all support New York State’s goals for clean air and a strong program to reduce greenhouse gas emissions. Moreover, we all acknowledge that ZEV trucks are and should be the future of the medium- and heavy-duty commercial vehicle market.

**The Issue**

Beginning in MY 2025, manufacturers will be required to meet a certain percentage of ZEV trucks, increasing annually through MY 2035. Today, New York State lacks the charging and refueling infrastructure necessary for ZEV trucks to operate. In order to successfully transition to ZEV trucks, New York will need to make significant investments to install and maintain the necessary ZEV-charging and refueling infrastructure that is currently nonexistent and will need to coordinate a substantial reconfiguration of the electric grid to ensure power is available to meet the increased demand throughout the regions where ZEV trucks will be in operation.

While New York is investing in, and has a long-term plan for, light-duty vehicle charging infrastructure, that envisioned build-out is vastly different from the necessary heavy-duty vehicle charging infrastructure.

Substantial time, education, investment, and coordination among affected stakeholders is necessary to achieve a zero-emission vehicle future. A recently released audit of New York Power Authority’s (NYPA) Charge NY and EVolve NY programs found that despite more than \$250 million of planned investment the program failed to place charging ports in nearly half of all counties over the course of six years and did not complete any of the planned projects for Phase 1 of the EVolve NY Program by its deadline. In the report, NYPA officials cited supply chain challenges, permitting and utility interconnection timelines as factors impacting the rollout.

By comparison, California has invested in its Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP) for more than 10 years, providing funding for more than 7,000 advanced technology vehicles with a plan to invest hundreds of millions of dollars more in the coming years. In addition, California utilities have established and made available well-funded charging infrastructure incentive programs.

New York must implement significant investments, like California has already done, to build toward a ZEV future.

Utilities must also establish well-funded charging infrastructure incentive programs in advance of regulatory requirements. For example, the Salt River Project in Arizona piloted an initiative to encourage fleets to switch to ZEV trucks. In Portland, Portland General Electric has opened a heavy-duty electric truck charging site called Electric Island.

Not only can utilities provide funding for purchase incentives and charging infrastructure expansion, but state and regional authorities can and should too. The California Air Resources Board has funded several commercial pilot projects to educate stakeholders about the roles each must play for meaningful ZEV penetration. Similarly, the California Energy Commission is funding the California Electric Vehicle Infrastructure Project, which has incentivized the installation of 925 Level 2 connectors and 245 DC fast chargers through rebates totaling around \$45 million. Air Districts within the state also offer charging infrastructure incentives. Through its *Charge!* Program, for example, the Bay Area Air Quality Management District made \$7 million in grant funding available in 2022 for organizations to install EV charging equipment.

States also play a pivotal role in encouraging stronger ZEV truck ecosystems, from the use of federal funds to encouraging energy demand tool use among utilities. States must factor in ZEV trucks when considering how to spend funds from the National Electric Vehicle Infrastructure Formula Program, which will provide \$5 billion to help states build out charging networks.

### **Our Call to the New York Public Service Commission**

The New York Public Service Commission (PSC) must take steps to address the significant, and growing, need for charging infrastructure to support electric medium- and heavy-duty vehicles (MHDVs) in the state and align infrastructure installation with the timeline of ACT sales requirements.

In July of 2020, the PSC issued an order for the state's utilities to create incentive programs for installing public EV chargers and chargers in multifamily residences. This order also created pilot programs targeted at electric MHDVs, but these pilots have gone almost completely unused since then and are not scaled to New York State's needs.

In the intervening years, New York State has advanced policies meant to accelerate the deployment of electric MHDVs in New York. This includes being a signatory on the multi-state memorandum of understanding on zero-emission MHDVs, a state law setting targets for zero-emission MHDV sales and deployment, and the recently adopted Advanced Clean Truck rule setting mandatory zero-emission MHDV sales requirements.

It is essential that the PSC align its policies with these targets and requirements by:

**1. Working with the state's utilities and other state agencies** to collect information on what chargers for MHDVs have already been installed in the state and their installation costs, and to develop an estimate of how many chargers will be needed to serve these vehicles in the coming years and the expected cost of the chargers and associated infrastructure

**2. Reviewing and modifying the current MHDV make-ready pilot program** with the goal of encouraging greater use of the pilot and aligning its scale with the actual number of

chargers needed over the next few years. New York State has stated that it will evaluate its supporting programs to determine if expansion and further support is needed, while also noting that developing complementary charging infrastructure programs are needed. To ensure that meeting the timelines outlined in the ACT rule, it is important that these timelines are aligned with programs to accelerate the deployment of utility infrastructure.

**3. Beginning a stakeholder process to address the state’s long-term needs for MHDV charging infrastructure** and considering the unique needs of these vehicles compared to passenger cars. This stakeholder process should be an opportunity for all interested stakeholders, including fleets, OEMs, logistics companies, community groups, and others to make their voices heard on these issues.

We stand ready to partner with the New York State PSC and other stakeholders to achieve our zero-emissions trucking future.

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Respectfully Submitted,

Partners for a Zero Emission Vehicle Future

*American Truck Dealers*

*New Jersey Coalition of Automotive Retailers*

*American Trucking Associations*

*New Jersey Business & Industry Association*

*Cleanfleets.net*

*PACCAR*

*Daimler Truck North America*

*NFI Industries*

*Navistar*

*New Jersey Gasoline, C-Store, Automotive Association*

*Volvo Group North America*

*Trucking and Engine Manufacturers Association*

*Truck Renting and Leasing Association*