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June 5, 2023

Hon. Michelle L. Phillips
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza Agency Building 3
Albany, NY 12223-1350

RE: Case No. 23-E-0070: Proceeding on Motion of the Commission to Address Barriers to Medium- and Heavy-Duty Electric Vehicle Charging Infrastructure.

Dear Secretary Phillips,

Attached for electronic filing in the above-referenced matter, please find comments on behalf of ChargePoint, Inc. Please let me know if you have any questions.

Respectfully,

/s/ Matthew Deal
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Attachment
CC: All parties (via DMS)

I. Introduction

On April 20, 2023, the Public Service Commission of New York (Commission) issued an order to initiate a new proceeding to address barriers to medium- and heavy-duty electric vehicle charging infrastructure (MHDV Proceeding). The Commission's order included a request soliciting responses to a series of questions regarding electrification efforts and proactive planning issues for medium and heavy duty vehicles (MHDVs). ChargePoint respectfully submits these comments in response to the Commission's solicitation.

As an initial matter, ChargePoint thanks the Commission for commencing a separate process to investigate best actions to support MHDV electrification in New York, as had been requested by a number of stakeholders, including ChargePoint, in Case 18-E-0138.[1]

ChargePoint believes that the outcome of this proceeding should build on the pilots in the EV Infrastructure Proceeding and establish a new comprehensive, full-scale, statewide infrastructure program to accelerate MHDV charger deployment based on the following considerations:

- The barriers to participation for the existing MHD Make-Ready Pilot program, including cumbersome eligibility requirements and high construction cost on the customer side of the meter, must be addressed in a new full-scale program.
- Cost allocation for utility-side upgrades to serve large charging sites must avoid overly burdening early adopters of electric MHDVs with high system upgrade costs.
- Utilities should be encouraged to proactively plan and build transmission and distribution infrastructure in areas with high anticipated needs.
- Because MHDVs that "return to home" or "return to base" for charging are likely to be low hanging fruit for electrification, this proceeding should prioritize policies to support depot charging in the short term and corridor charging in the long-term.
- Future-proofing efforts are crucial to cost-effective electric infrastructure and should be focused on driving scale and maturation of the MHDV segment.
- Technical assistance for fleet advisory services should avoid duplication of assessment services already offered by the private market.

II. About ChargePoint

Founded in 2007, ChargePoint is a leading global electric vehicle charging network that is headquartered in Campbell, California. To date, we have delivered 145 million charges, thus enabling four billion electric miles and avoiding 199 million gallons of gasoline. At ChargePoint, EV charging is all we do, and we do it all. Passenger cars, delivery vehicles, buses, and more—we charge any EV, anywhere it goes. We have built a fully integrated portfolio of hardware, cloud services and support with the best technology in the

[1] [1] Case 18-E-0138, the Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure ("EV Infrastructure Proceeding").

industry. We offer solutions for home, government, multi-family, commercial, and fleet electric vehicle charging infrastructure.

ChargePoint's hardware offerings include Level 2 (L2) and DC fast charging (DCFC) products, and ChargePoint provides a range of options across those charging levels for specific use cases including light duty, medium duty, and transit fleets, multi-unit dwellings, residential (multi- family and single family), destination, workplace, and more. ChargePoint's software and cloud services enable EV charging station site hosts to manage charging onsite with features like access control, charging analytics, and real-time availability. With modular design to help minimize downtime and make maintenance and repair more seamless, all products are UL-listed, and CE (EU) certified, and many of our Level 2 solutions are ENERGY STAR® certified.

ChargePoint's primary business model consists of selling smart charging solutions directly to businesses and organizations and offering tools that empower station owners, or site hosts, to deploy EV charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven, cloud-enabled capabilities that enable site hosts to better manage their charging assets and optimize services. For example, with those network capabilities, fleet managers can view data on charging station utilization, control the frequency and duration of charging sessions, and optimize charging activity to lower costs and manage site-specific constraints. Additionally, ChargePoint has designed its network to allow other parties, such as electric utilities, the ability to access charging data and conduct load management to enable efficient EV load integration onto the electric grid.

III. Responses to the Commission's Questions

What are the specific challenges to developing charging infrastructure for medium- and heavy-duty (MHD) vehicles?

1. *Energization timelines*

Compared to light duty vehicles, MHDVs have larger batteries to accommodate the duty cycles of larger vehicles with payloads. As a result, MHDVs typically require higher-power charging solutions than light-duty vehicles, which may complicate and slow down the utility interconnection process. For example, it would be conceivable for a depot to add 5 megawatts (MW) of new load to support electrification of a large MHDV fleet. Charging infrastructure for MHDV vehicles therefore experience the challenge of long lead times for the utility system planning and development. While a MHDV may be delivered from the original equipment manufacturer (OEM) in a six-to-nine month timeline, energization of charging infrastructure may take significantly longer. A major challenge is to ensure that energization timelines for charging infrastructure align with vehicle acquisition timelines. Otherwise, both vehicles and charging infrastructure on-site are likely to sit unused while sites await energization.

Additionally, grid capacity upgrades can cause delays of up to two years in the energization of needed charging equipment. Such long delays can discourage EV adoption if drivers experience long wait times during travel or if fleet operators are not able to get the necessary power to charge their vehicles. These long wait times can be reduced by better planning for and anticipating EV charging needs.

The Commission can facilitate proactive planning by ensuring that utilities' General Rate Cases (GRCs) accurately account for EV load growth consistent with the achievement of New York's transportation electrification goals and include necessary funding and staffing levels to quickly build out infrastructure needed to meet the demand for EV Supply Equipment (EVSE) as the need arises.

2. *Long lead times*

Transformer shortages are impacting projects across the country and can cause project delays up to 24 months. This issue is a threat to New York's broader electrification goals and is only expected to continue to grow in magnitude.[2] Evaluating the procurement process for transformers is important and identifying best practices amongst utilities can help reduce bottlenecks. For instance, it may be useful to procure and allocate transformers based on forecasts versus historical data given that electrification is growing at such a rapid pace. The Commission should encourage the utilities to proactively procure transformers and other long lead time equipment to alleviate bottlenecks. For example, recent legislation in Colorado would allow public utilities to recover the cost of equipment acquired in inventory if it is projected to be used within five years to enable timely interconnection.[3] Additionally, New York may consider manufacturing incentives to bolster the supply of transformers and other grid-related equipment.

3. *Cost*

Although cost is also a barrier for light duty vehicle electrification, the issue of cost is amplified for MHDVs by virtue of the higher power demands required to charge a MHDV fleet. Because of the high costs, customers are incentivized to limit upfront investments required to support early electrification efforts by under-sizing make-ready infrastructure. Piecemeal installation of charging infrastructure will be significantly more expensive in the long-run due to the repeated expenses of trenching and wiring, utility-side upgrades, and decentralized charging infrastructure.[4] Therefore, a key challenge for the MHDV sector is how to proceed with early-stage electrification that adequately balance minimizing near-term costs and preparing for long-term charging needs.

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[2] During a presentation at the National Charging Initiative's Energize! Workshop at Roadmap 2023, a representative from Edison Electric Institute shared that transformer delays may last for 5 years or more without policy intervention.

[3] Colorado Senate Bill 23-016 at Section 18, 40-2-135(6), available at: http://leg.colorado.gov/sites/default/files/documents/2023A/bills/2023a_016_enr.pdf

[4] Rocky Mountain Institute, "Steep Climb Ahead—How Fleet Managers Can Prepare for the Coming Wave of Electrified Vehicles," 2021, available at: https://rmi.org/insight/steep-climb-ahead/

Related to the issue of cost is the issue of cost allocation. Because grid system upgrades are more likely to be large and highly costly to support MHDV electrification, the traditional service line extension model to pay for utility-side infrastructure may overly burden a single early-mover with a disproportionate amount of systemwide cost.

It may be necessary to establish a process by which each utility is able to record and recover prudently incurred costs associated with infrastructure needs to support EV charging that exceed what was anticipated in the GRC. The transition to EVs is happening more quickly than expected, and electricity planners should anticipate that adoption forecasts may undershoot actual demand. Allowing utilities to establish a memorandum account or some other means to record and recover prudently incurred EV infrastructure-related costs that exceed GRC funding allocations would ensure that forecasts do not become a limiting factor on the speed of EV adoption.

How do charging needs differ for school buses, transit buses, delivery trucks, garbage trucks, box trucks, stake trucks, transport refrigeration units, and other specialized equipment? a. What other types of MHD vehicles, if any, should be considered in this proceeding?

ChargePoint has provided charging solutions for over 5,000 customers with a diverse set of electrification goals and charging needs, and there is no one-size-fits-all approach within vehicles in a particular specialized segment. MHDVs are working vehicles that serve a diverse set of purposes, and every fleet is unique regarding the factors that influence their charging infrastructure needs, including size, operating hours, miles travelled, payload, and ability to schedule charging behavior. For example, a school bus fleet in an urban area that travels relatively short distances may have different charging needs than a school bus fleet in a rural area with greater geographic spread.

Further, there is great variety in the charging needs of MHDVs not just across vehicle types, but within fleets for vehicles serving different purposes. Fleet operators are likely to initially prioritize electrification of MHDVs to vehicles with lower intensity duty cycles, particularly as they gain experience managing the transition to an all-electric fleet. For example, within a single transit agency, some buses will serve longer/more frequent routes and travel greater distances than others. As such, charging and infrastructure needs are likely to change over time, even within vehicles of the same class. For this reason, this proceeding should not focus on specific types of MHDVs, but broadly establish policies that will empower fleets with the agency to move forward with electrification as it becomes feasible for their vehicles. This approach will provide flexibility to support rapid scaling up of electric MHDVs as different market segments mature at different paces and avoid leaving any segments behind.

What locations or types of locations should be considered as potential hubs for MHD vehicle charging?

It is critical for utilities to be able to proactively plan (and build) for new EV load by expanding transmission and distribution capacity to priority areas – including corridor and urban areas – in advance of new service connection requests. If infrastructure is not built out and ready in advance of the new service requests, entities seeking to build new DC fast-charging sites will have no incentive to site their projects in the locations identified, and the benefits of this type of process would not be realized.

That said, depot and corridor charging use cases will require fundamentally different strategies for siting charging hubs. Depot charging refers to charging infrastructure that supports vehicles which "return to home" between shifts. A fleet of delivery vans that distribute packages during the day and return to a logistics center to charge at night is one primary use case of depot charging. Corridor charging, on the other hand, refers to public en-route charging to support MHDV electrification for applications such as long-haul trucking, where vehicles may travel hundreds or thousands of miles to transport goods.

Although corridor charging may be similar to the existing gas station or truck stop model, where vehicles refuel at public stations along their route, depot charging at a fleet's "home base" is where the majority of MHDV charging will happen in the short term. Supporting polices to accelerate depot charging should be the short-term priority for this proceeding. Vehicles with "return to home" duty cycles represent low-hanging fruit for entities that are planning their long-term vehicle electrification strategies, as such vehicles tend to have highly predictable routes and schedules that lend themselves to electrification at the current stage of market development. In terms of grid upgrade planning and selection of sites for anticipatory upgrades, the locations of existing vehicle depots present a good picture as to where additional capacity will be needed in the short and medium term to support electrification of fleets.

A "depot-first" approach will encourage better long-term planning by fleet applicants, incentivize EV charging installations that use the minimum power necessary to support operations, and ensure that fleet operators can plug in MHDVs as soon as vehicles are available and delivered. For this reason, fleet operators should be leaders on site selection for MHDV charging, and the utility's role should be to support customers in upgrading electric service where they already have operations.

Though the expansion and siting of corridor charging infrastructure is critical to MHDV electrification, particularly for long-haul applications, the scale of new capacity required presents a significant planning and siting challenge. A recent whitepaper authored by National Grid and CALSTART finds that high-demand charging sites in New York could reach 40 MW of peak charging capacity by 2045.[6] Unlike depot charging, where fleets will want to add capacity where their business operations are currently sited, there is much more flexibility built into the siting of corridor charging hubs. For example, if it is determined that five charging hubs for MHDVs are needed along the I-90 corridor, there may be dozens of suitable locations. The "right" sites should not only incorporate consideration of where interconnection will be easiest and cheapest, but

[6] https://calstart.org/wp-content/uploads/2022/11/Electric-Highways-Study-November-2022.pdf

also be located near amenities that make sense for MHDV fueling routes (like restrooms, restaurants, and lodging). Due to the higher level of complexity associated with siting MHDV corridor charging, it may be appropriate to consider it as a long-term goal of this proceeding.

What considerations are important for stakeholder engagement concerning MHD electrification? Describe effective strategies to engage that can meet the needs of fleets with 6 vehicles or less.

Unlike large fleets with dozens or hundreds of vehicles, small fleets (i.e., fleets with six vehicles or less) are likely to have significantly fewer resources and be less sophisticated in planning for infrastructure and EV acquisition. In many scenarios, such operators will have had limited experience engaging with their utilities and managing issues such as site EV-readiness and encouraging off-peak charging behavior. Further, a small fleet might only upgrade one vehicle at a time as older vehicles are retired and be more sensitive to upfront costs. Together, these factors put small fleets at risk of undersizing make-ready infrastructure, the consequence of which is likely to be higher infrastructure costs in the long run. For these reasons, stakeholder engagement is contingent upon the direct value that the utilities offer to small fleets. ChargePoint recommends that utilities consider program design efforts to right-size infrastructure upgrades to small fleet customers as they prepare for electrification.

Identify barriers that exist in the current MHD Make-Ready Pilot Program that could be modified in a successor to the pilot.

In Case 18-E-0138, the *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, the Commission approved a $24 million make-ready program for MHDVs within the statewide make-ready program.[7] In response to the Commission's order in that proceeding, DPS Staff initiated a midpoint review of the program in 2022, during which stakeholders submitted feedback on a variety of make-ready program issues, including the MHD Make-Ready Pilot Program.[8] Stakeholders' comments coalesced around the following issues with the existing program:[9]

1. Expansion of the MHD Pilot to a comprehensive, full-scale, multiyear program is needed to meet state climate and transportation electrification objectives.
2. The MHD Pilot should be modified to address customer-side make ready costs in addition to utility-side make-ready costs.
3. Eligibility requirements to participate in truck voucher incentive programs (such as NYSERDA's New York Truck Voucher Incentive Program or New York City's Department of

[7] Case 18-E-0138, the Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs* ("Make Ready Order") filed on July 16, 2020.

[8] The midpoint review process for the make-ready program in Case 18-E-0138 remains ongoing.

[9] Case 18-E-0138, Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*, Department of Public Service Staff Electric Vehicle Make-Ready Program Midpoint Review and Recommendations Whitepaper ("*Midpoint Review Staff Whitepaper"), filed on March 1, 2023.

transportation New York City Clean Trucks Program) limit the number of eligible fleets that may take advantage of the MHD Make-Ready Pilot and should be removed.

In the Midpoint Review Staff Whitepaper, filed with a summary of stakeholder comment for the midpoint review process, DPS Staff recommended allocating an additional $30 million to the MHD Pilot Program. Although consideration of changes to the make-ready program is ongoing, ChargePoint applauds Staff's commitment to accelerate MHDV electrification through its recommendation to allocate additional funds to the existing program.

However, Staff declined to propose any changes to address the issues of eligibility and customer-side costs as raised by stakeholders in the midpoint review process. Although Staff's recommendation to increase the MHD Make-Ready Pilot budget by $30 million is a significant step in the right direction, the additional funds do not address the implementation issues that prevent fleet operators from taking advantage of the existing MHD Make Ready Pilot. Notably, the midpoint review process revealed that 96% of fleet operators engaged by the Joint Utilities to participate in the MHD Make-Ready Pilot failed to participate due to the cumbersome eligibility restrictions.[10] A successor program should be the outcome of this proceeding and must address the three issues listed above. In addition, ChargePoint recommends that when the successor program is made available, any remaining funds in the MHD Make-Ready Pilot should be shifted to the successor.

Through the Make-Ready program, utilities offer fleet assessment services to help prepare for the transition to electric vehicles. What additional technical assistance is needed to support the transition to mass MHD electrification?

Technical assistance for fleet assessment may include a variety of services, including EV savings calculators, implementation coordination, and post-energization support. In many instances, such technical assistance is offered by private market actors. While ChargePoint believes there is an important role for the utilities in raising awareness of the benefits of transportation electrification, there are many unique and complex factors that go into fleet electrification decisions, and such decisions can and should be resolved through collaboration with private market actors such as a site's EVSE provider. It remains unclear whether the utility is the proper entity to offer broad fleet assessment services. Utilities already often require support from private market actors to offer fleet assessment services, and additional technical assistance should primarily aim to fill any gaps that may exist, rather than duplicate what is already available on the private market.

For example, ChargePoint provides evaluations of EV charging needs now and as EV fleets grow, as well as savings estimates with charging management tools.[11] Additionally, ChargePoint's fleet services can manage bidding, vendor selection, and permitting processes. ChargePoint's consultative design/build services guide customers from site layout, construction and operational

[10] Midpoint Review Staff Whitepaper at 49.
[11] https://info.chargepoint.com/FleetAssessmentRequest.html

planning for scheduling, electricity use and charging optimization, to mission-critical response and resolution, providing end-to-end project management. Our fleet service experts also can provide information on available incentives and grants. Other EVSPs, including Shell Recharge[12] and bp pulse[13], provide similar solutions.

The private market, including ChargePoint, often will provide many of these services for free, as they are typically considered costumer acquisition or lead generator costs. Additionally, the private market often publicizes free resources, such as white papers and infographics, to support customers throughout the process. Importantly, these costs are incurred by the private market and not recovered from the general rate base.

Discuss how proactive EV infrastructure planning differs for light-duty and MHD vehicle market segments?

As discussed previously, there are two important differences between the light duty and MHDV segments. First, MHDVs will likely require higher power charging infrastructure than light-duty vehicles. Second, the market for light-duty vehicles is more mature, as there is greater vehicle availability and greater cost parity compared to gas-powered vehicles. By contrast, the market for MHDVs is less mature, so it may be harder for fleet operators to prepare a roadmap for charging infrastructure for heavy duty vehicle applications where few electric models are available or are highly costly. In other words, planning charging infrastructure for last-mile delivery vehicles is currently more feasible than planning infrastructure for long haul trucks. Considering the vast differences in market development, ChargePoint reiterates that infrastructure planning should be geared towards vehicles with depot charging arrangements that are more likely to deliver the benefits of MHDV electrification in the short-term.

Discuss how battery energy storage systems and other distributed energy resources can be implemented in both short-term and long-term planning for electric vehicle charging needs across vehicle classes.

Installation of MHDV charging infrastructure requires grid interconnection, which typically involves electric distribution upgrades for site with limited on-site power capacity. The exact level of required upgrades varies by site, as it is highly dependent on the scale of the utility's existing infrastructure assets as well as other loads served by the local transformer. In situations where grid-side upgrades are extensive and highly costly, load management software can help manage site constraints and move projects forward.

Site load management to respond to utility time-of-use rates, for example, is also possible through ChargePoint's software management capabilities, which enable site hosts to manage power and control load to optimize charging behavior. For example, ChargePoint's software solutions would enable a fleet operator to schedule their charging behavior to occur overnight to minimize on-peak consumption, lower fuel costs, and minimize the impact to the distribution system. Although

[12] https://shellrecharge.com/en-us/solutions/industry/ev-fleets
[13] https://bppulsefleet.com/fleet/products/charge-management-software/

battery storage systems and on-site solar generation incur additional upfront cost to the site host, they can be advantageous where system-side constraints limit power capacity at a site. ChargePoint's software solutions allow seamless integration of charging behavior with the operation of on-site distributed energy resources.

Is vehicle-grid integration technology at a sufficient level of maturity to impact short-term planning considerations? If so, describe how; if not describe why not.

Vehicle-grid integration may refer to strategies ranging from managed charging programs, which encourage load shift to off-peak times, to bidirectional charging programs, in which an EV may act as a generating asset and discharge energy back to the grid. While managed charging programs that simply shift load to off-peak times have been implemented in a variety of service territories across the country, more complex bidirectional charging programs are limited to the pilot stage and not yet commercially available. For this reason, bidirectional charging should not yet impact short-term planning considerations, as this proceeding should focus on full-scale and comprehensive solutions for MHDV electrification. Managed charging programs are ready for commercialization and are likely to deliver benefits both to the grid and fleet operators, many of which have a high degree of control over the charging behavior of their vehicles.

How can managed charging programs reduce upfront infrastructure needs?

In areas with limited utility-side capacity, ChargePoint offers power sharing as a form of managed charging to support vehicle electrification while minimizing utility side infrastructure needs. In a typical application, a customer with constraints on the grid side may not be able to exceed a certain power threshold. Power sharing would allow the fleet operator to ensure that the total power of their chargers does not exceed the predetermined limit, such as by establishing "first-come, first-served" charging in which a vehicle completes its charging session before the next vehicle starts its session. In other words, charging may be scheduled to be sequential to avoid exceeding the site power limit. Power sharing may also allow multiple vehicles to throttle down charging speed to stay beneath the power limit. There are several such advantages to the customer of power sharing, including the ability to respond to time-varying rates and to allow more chargers to be installed without needing to upgrade the electrical service to the site. As many fleets are well-equipped to manage and schedule charging behavior across their vehicles, the Commission should consider how to accelerate customer-side make ready deployment for customers who are willing and able to limit or delay utility-side upgrades.

What strategies can reduce the risk of future-proofed sites from becoming stranded assets if a fleet or other baseload user changes their operations or moves to a different site?

ChargePoint expects that the risk of stranded infrastructure assets is low, as fleet customers are already constrained by the challenges of acquiring new real estate that meets all their business needs. That is, maintaining regular business operations at capacity-constrained sites limits the ability of fleet operators to relocate operations to take advantage of locations with more grid capacity and cheaper infrastructure needs, even if doing so would advance their EV adoption

goals. In cases where fleet customers with futureproofed sites do significantly change their operations, such as by moving or abandoning a site by going out of business, commercial sites with futureproofed infrastructure capacity will likely attract new occupants that will likely be able to take advantage of the site's futureproofed capacity for their own operations.

Nonetheless, the risk of stranded utility-side assets may be reduced if customers have a financial stake in futureproofed sites. A key problem with the existing MHD Make Ready Pilot is that no incentives are available for customer-side infrastructure. A new full-scale program should provide meaningful incentives for customer-side infrastructure, and there should be a cost-share component to ensure that fleet operators invest some of their own capital in future-proofed infrastructure on the customer side of the meter.

In the Northeast, climate change is expected to increase the frequency and intensity of storms, especially extreme precipitation and extreme heat, and lead to more frequent high tide flooding. Should the impact of current and future climate vulnerabilities be addressed in the infrastructure planning process (e.g., sites that are in or are projected to be in the floodplain)? If so, how?

The issue of stranded utility assets in the context of climate vulnerabilities is not unique to EV charging infrastructure. Changes to the infrastructure planning process should be addressed not just in the context of MHDV infrastructure, but for all new interconnections that the utilities enable, such as for new housing and new commercial areas.

What types of site locations and use cases should be prioritized for proactive future-proofing, and why?

As discussed earlier, operations for fleets within the same use case (i.e., transit) can vary broadly in a manner that has significant implications for charging needs and infrastructure deployment. Although every fleet is different, across all use cases and fleet types, systemic and long-term approaches to infrastructure upgrades are more likely to limit the risk of stranded assets than incremental, piecemeal approaches.[14] Long-term approaches to future proofing require a high degree of planning and sophistication by the customer, who is also the stakeholder in the best position to communicate their charging needs to the utility for futureproofing.

Customers should be able to opt into future proofing so long as there is evidence to indicate that the benefits of futureproofing will be realized. For example, an entity with a plan to electrify the entirety of their MHDV operations and the sophistication to manage a rapidly electrifying fleet will be best positioned to take advantage of the benefits of futureproofing, at least in this early stage of the market. The MTA is one good example, as the agency not only has ambitious goals to transition to a zero-emissions fleet, but is strongly incentivized to reduce costs and complexity of

[14] Rocky Mountain Institute, "Steep Climb Ahead—How Fleet Managers Can Prepare for the Coming Wave of Electrified Vehicles," 2021, available at: https://rmi.org/insight/steep-climb-ahead/

its EV deployment.[15] Furthermore, converting large fleets of EVs via future proofing can drive scale, which not only influences broader trends for electrification, but also may help to streamline permitting and utility interconnection processes for smaller, less-sophisticated customers that may struggle to identify the right electrification in the nascent market.

IV. Conclusion

ChargePoint appreciates the opportunity to submit this response. We look forward to continued collaboration with the Commission, DPS Staff, and other stakeholders to establish a robust policy framework to accelerate the development of MHDV charging infrastructure in New York.

[15] https://new.mta.info/project/zero-emission-bus-fleet