

June 1, 2022

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

**Re: Support for Petition of Environmental Defense Fund, NRDC, Sierra Club, CALSTART, South Bronx Unite, and the City of New York on the Initiation of a Proceeding and Interim Measures Addressing Electric Vehicle Supply Equipment and Infrastructure for Medium- And Heavy-Duty Electric Vehicles**

Dear Secretary Phillips:

Acadia Center offers its strong support for the petition submitted on May 9, 2022, by the Environmental Defense Fund and other parties in Docket No. 18-E-0138. We urge the Commission to address the infrastructure needs of medium and heavy-duty vehicle (MHDV) fleets and to position New York's utilities to meet these needs in a manner that is consistent with the State's electrification goals and mandates.

[Acadia Center](#) is a non-profit, research and advocacy organization committed to advancing a clean energy future. Acadia Center pushes to advance bold, effective, and equitable clean energy solutions by tackling complex problems, identifying clear recommendations for reforms, and advocating for significant change that supports a low-carbon economy across the Northeast which can then be a model for application elsewhere. Acadia Center identifies regional, state, and local improvements that will dramatically reduce carbon pollution and improve the quality of life in the Northeast, hence, our endorsement for any effort to advance the deployment of zero-emissions transportation technologies.

In the coming years, electric MHDV deployment is poised to accelerate rapidly in New York State, and fleet owners will need significant charging capacity to support these vehicles. A 2021 study by M.J. Bradley and Associates found that more than two-thirds of electric medium and heavy-duty vehicle (MHDV) models will be cost-competitive with equivalent internal combustion vehicles on a total cost of ownership basis by 2025.<sup>1</sup> Researchers from the National Renewable Energy Laboratory estimate that all zero-emission MHDV models

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<sup>1</sup> M.J Bradley and Associates, Medium- & Heavy-Duty Vehicles: Market Structure, Environmental Impact, and EV Readiness 23 (July 2021), available at <https://www.mjbradley.com/reports/medium-heavy-duty-vehicles-market-structure-environmental-impact-and-evreadiness>.

will be cost-competitive with their fossil-fuel counterparts on a total cost of ownership basis by 2035, with some medium-duty vehicles reaching that point by 2026.<sup>2</sup> This means that for many businesses, an electric truck or bus may be the most cost-effective option when they next replace their vehicles. However, these studies rely on the assumption that sufficient charging infrastructure is available.

Given the substantial lead time that will be required to prepare the grid for the anticipated increase in load, there is an urgent need for the Commission to support the creation of programs and policies that will accelerate the development of electric MHDV infrastructure. Further, any delay in building out critical systems for electric MHDVs may not only prevent the state from achieving its net-zero emissions goals but will continue to subject disadvantaged communities to harmful impacts of pollution from diesel-fueled vehicles.

The success of the state's transition to a zero-emissions future depends on the collective will to take decisive action in the present. New York State cannot wait. Acadia Center strongly encourages the Commission promptly to take the necessary steps to identify, understand, and address the full range of electric MHDV infrastructure challenges not covered by existing initiatives, programs, and policies. The Commission, in partnership with its sister agencies, must co-create a framework for electric utilities to implement programs aligned with the state's long-term goals for zero-emissions MHDV deployment.

Respectfully Submitted,

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<sup>2</sup> National Renewable Energy Laboratory, *Decarbonizing Medium- and Heavy-Duty On-Road Vehicles: Zero-Emission Vehicles Cost Analysis 19* (March 2022), available at <https://www.nrel.gov/docs/fy22osti/82081.pdf>.