



May 27, 2022

VIA ELECTRONIC MAIL

Hon. Michelle L. Phillips  
New York Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

**Re: Case 18-E-0138 – Proceeding on Motion of the Commission Regarding Electric Vehicle Supply**

Dear Secretary Phillips:

Proterra supports the petition submitted on May 11, 2022, by CALSTART, Environmental Defense Fund, Natural Resources Defense Council, Sierra Club, South Bronx Unite, and WE ACT for Environmental Justice in the above referenced docket. 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.

Proterra is an American technology leader that specializes in battery-electric, zero-emission transit buses and technology solutions for electric commercial vehicles, including delivery trucks, material handling equipment, and more. At Proterra, our mission is to advance electric vehicle technology to deliver the world's best performing commercial vehicles; thus, we endorse this effort to advance the deployment of zero-emission 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. This is thanks to not only the State's zero-emission vehicle mandates, but also the realities of changing technology and economics. 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 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, electric trucks and buses are rapidly becoming a viable, and

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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>.

<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>.

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preferable, option when replacing or adding vehicles to their fleet. But this transition can only happen at scale if sufficient chargers are in place and the grid is ready to support them.

Given the substantial lead time that will be required to prepare the grid for these new loads, 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 to support MHDV charging may not only prevent the state from achieving its net-zero emissions goals but will ensure disadvantaged communities continue to endure harmful impacts of pollution from diesel-fueled vehicles.

The success of the State's transition to a zero-emission future depends on our collective willingness to take decisive action in the present. New York State cannot wait. We strongly encourage the Commission, in partnership with its sister agencies, to 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 must address the limitations in its current pilot programs that have gone largely unused by fleets. And it must create a framework for electric utilities to implement programs aligned with the state's long-term goals for zero-emissions MHDV deployment.

Thank you in advance for your prompt attention to this matter. If you have any questions or require additional information, please do not hesitate to contact me at [lbattenberg@proterra.com](mailto:lbattenberg@proterra.com).

Sincerely,

Lindsay Battenberg  
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