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Honorable Michelle Phillips
State of New York Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Re: Proceeding 24-E-0364 – Letter of Support for ConEdison Urgent Proactive Planning Proposals

Dear Secretary Phillips,

Thank you for the opportunity to submit this letter of support regarding the Consolidated Edison Company of New York ("ConEdison") Urgent Projects Proposal submitted on November 13, 2024 in this proceeding. We expect the Urgent Upgrades Proposal to have a significant, positive impact on our ability to deploy charging infrastructure to serve EV drivers in New York and to accelerate electrification of Class 8 trucks with the Tesla Semi.

Tesla Supercharger Network

Tesla's mission is to accelerate the world's transition to sustainable energy through the development, manufacture, and sale of all-electric vehicles and clean energy products, including solar photovoltaics and battery storage. Tesla is a manufacturer of electric vehicles, solar generation and energy storage equipment, as well as EV charging equipment, and is also an EV charging network owner and operator.

Tesla owns and operates an extensive network of Direct Current fast chargers ("DCFCs") known as the Supercharger network. Tesla Superchargers are DCFC stations, conveniently located near desirable amenities like restaurants, shops and WiFi hot spots. Each station contains multiple Superchargers to get customers back on the road quickly and to minimize wait time. With more than 65,000 Supercharger ports, Tesla owns and operates the largest fast charging network in the world. In New York, Tesla operates over 100 Supercharger stations with 1,000+ ports, making up nearly half of all fast-charging ports in the state.

The Supercharger network grew by 19% globally in 2024, with continued growth expected in 2025. Dozens of sites and hundreds of new stalls are preparing to open across New York this year. In our experience, lack of grid infrastructure often serves as a critical bottleneck to charger deployment that extends project timelines and delays station availability. Tesla expects the pace of Supercharger openings will materially improve with proactive efforts to prepare the electrical grid to increase capacity in anticipation of customer energization requests.

Tesla Semi

In 2017, Tesla introduced the Tesla Semi, a Class 8 truck designed from the ground up to be the most efficient and safest truck on the market. The Tesla Semi focuses on reducing NOx and greenhouse gas (GHG) emissions from goods movement and transportation. The Semi comes in two models with ranges of 300 and 500 miles respectively and demonstrates that an all-electric truck can meet virtually any duty cycle when paired with a Megawatt Charging System ("MCS"). The Tesla Semi can help reduce emissions from the combination truck sector, which account for about 16% of U.S. vehicle emissions. With less than 2 kWh per mile of energy consumption, the Tesla Semi can travel up to 500 miles on a single charge, fully loaded.

Since unveiling the Tesla Semi, a significant number of fleets with substantial freight needs have placed reservations, indicating broad industry demand for heavy-duty electric vehicles. Tesla plans to scale production of

the Tesla Semi substantially over the next few years with the completion of a new factory dedicated to Semi production adjacent to our existing facility at Gigafactory Nevada. Fleets will be deploying the Tesla Semi in a wide range of applications, including but not limited to, manufacturing, retail, grocery and food distribution, package delivery, dedicated trucking, rental services, intermodal, drayage, and other applications. We expect customers of the Tesla Semi in New York will need to rely on a combination of private depot charging at their existing facilities and public infrastructure to fuel their vehicles, in which case, lack of electrical capacity can delay projects significantly—thus delaying the sales and order of vehicles.

ConEdison Urgent Projects

In the proposal, ConEdison identified seven projects that proactively prepare the grid for customer electrification. These projects include upgrades to primary distribution feeders, as well as upgrades to sub-transmission feeders and area substations, in locations where EV charging “hot spots” are expected to emerge. In these hot spots, it is unlikely that the traditional grid planning process is timely enough to alleviate capacity bottlenecks to accommodate new and upcoming customer electrification requests. Additionally, ConEdison has proposed two distribution system programs to accommodate existing customer demand for electrification that will provide territory-wide benefits.

We note that ConEdison’s Urgent Proactive Projects Proposal is consistent with the information and vision established by ConEdison and communicated to New York stakeholders over the last several years. For example, on June 5, 2023, ConEdison submitted a filing in Proceeding 23-E-0070¹ that highlighted a specific anticipated hot spot for fleet electrification based on its location at the intersection of several major thoroughfares and its over twenty fleet depots and service centers – Zerega Avenue. In that filing, ConEdison demonstrated how a “just-in time” approach to infrastructure would risk insufficient capacity availability for fleet customers that purchase medium-and-heavy-duty electric vehicles with intent to charge them at their existing facilities at Zerega Avenue. Accordingly, the Zerega Avenue project is one of the seven urgent proactive projects that ConEdison proposes as an urgent proactive upgrade in this proceeding.

The June 2023 filing also presented an early vision for the need for proactive investment and intention to continue proactive planning studies to identify critical needs across the ConEdison service territory. We applaud ConEdison for the consistency of communication and refinement of needs analyses between that 2023 filing and this Urgent Projects Proposal. The Urgent Projects Proposal in this proceeding is a natural next step to ConEdison’s work to support customer electrification. As Tesla prepares to scale Tesla Semi deployments, we expect proactive upgrades of commercial-industrial sites around Brooklyn and Queens will be critical to unlock potential customers’ ability to replace their existing diesel Class 8 fleets with EVs.

Conclusion

Thank you for the opportunity to submit this letter of support. We look forward to continuing to work with the Public Service Commission, ConEdison, and other stakeholders to advance EV adoption and achieve New York’s transportation electrification goals.

Sincerely,

Mal Skowron
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Tesla, Inc.

¹ Proceeding on Motion of the Commission to Address Barriers to Medium- and Heavy-Duty Electric Vehicle Charging Infrastructure,