



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

June 8, 2022

RE: Case 18-E-0138—Support for CALSTART, Environmental Defense Fund, Natural Resources Defense Council, Sierra Club, South Bronx Unite, and WE ACT for Environmental Justice Petition

Dear Secretary Phillips:

Nuvve Holding Corporation (“Nuvve”) is writing to you in support of the recently filed petition of CALSTART, Environmental Defense Fund, Natural Resources Defense Council, Sierra Club, South Bronx Unite, and WE ACT for Environmental Justice (“Petitioners”) requesting that the New York State (“NYS”) Public Service Commission (“Commission”) initiate a proceeding and interim measures addressing electric vehicle supply equipment and infrastructure for medium- and heavy-duty electric vehicles (“MHD EVs”). NYS has recently made notable commitments to the electrification of the state’s MHD vehicle fleets to achieve the goals established in the Climate Leadership and Community Protection Act (“CLCPA”).

Nuvve is a San Diego-based company operating across the U.S. and internationally whose mission is to lower the cost of electric vehicle ownership while supporting the integration of renewable energy sources, such as wind and solar. Nuvve’s Grid Integrated Vehicle (“GIVE™”) platform transforms EVs into grid assets when those vehicles are connected to a bidirectional charger while guaranteeing the expected level of charge at the time the owner or driver needs it for transportation.

In partnership with Con Edison and others, we successfully demonstrated that electric school buses (“ESBs”) provide a viable option for zero-emissions transportation of millions of NYS students while also serving as a valuable resource supporting the NY grid. Nuvve’s current fully UL 1741 SA certified DC bidirectional charger paired with a production line V2G capable bus represents a significant advancement from the Con Edison pilot. Nuvve is pursuing the commercialization of ESBs with bidirectional chargers and our V2G software solution in the northeast. This includes a project currently under development in partnership with PSEG Long Island.

Nuvve agrees with the Petitioners that NYS lacks a clear and structured approach for the planning and deployment of the necessary infrastructure to support the ambitious policy goals established for MHD EV adoption in NYS. While NYS has made progress in preparing for the adoption of MHD EVs, these efforts are not calibrated to the state’s ambitions. Nuvve has first-hand experience with the delays and

problems stemming from a lack of coordination and advanced planning for successful electrification initiatives.

Governor Hochul's budget agreement includes a commitment to electrify the entire school bus fleet by 2035. This, in conjunction with the state's commitment to the Advanced Clean Trucks Rule, will lead to a significant number of MHD EVs being deployed in the coming years. From Nuvve's experience in working in other states, we understand the need for advanced planning and coordination with utilities, regulators, and other stakeholders well in advance of the expected adoption to provide the necessary charging infrastructure.

Nuvve supports the Petitioners' requested three-pronged approach to place NYS on a trajectory to plan for and deploy the charging infrastructure needed to support the MHD EV mandates that have been established. This includes:

- collect data on the anticipated MHD EV deployments and the required charging infrastructure as soon as possible;
- assess current mechanisms to incentivize investments in charging infrastructure and how they could be revised to include greater emphasis on the needs of MHD EV fleets; and
- initiate an inclusive process to gather diverse views on how to best take up the key issues to support MHD EV charging issues not currently being addressed.

Nuvve appreciates the opportunity to offer our support for the Petitioner's request that the Commission initiate a proceeding and interim measures addressing charging infrastructure for the MHD EV fleets that will be arriving in NYS soon.

Sincerely,



Steve Letendre, PhD
Director, Regulatory and Government Affairs-East Region

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