

July 1, 2022

Draft Scoping Plan Comments
NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

Dear Climate Action Council Members:

ChargePoint applauds the Climate Action Council for including a clean fuel standard (CFS) in the draft scoping plan. As you know, the transportation sector is the second-largest source of greenhouse gas emissions in New York State. With a clean fuel standard, New York can promote new job growth and investment in clean technologies like electric vehicle charging, reduce reliance on fossil fuels, improve public health, and help the state reach its climate goals without state tax funding. ChargePoint also supports additional policies included in the plan and supports the continuation and implementation of them to assist in achieving the goals of the Climate Protection Act. These policies include: the large investment of Make-Ready funding available in New York, the Charge Ready NY program, and EV Ready building and energy codes. These are all important tools to reach the bold climate goals the State is working to achieve.

By way of background, ChargePoint is the nation's leading electric vehicle ("EV") charging network. ChargePoint internally designs, develops, and deploys residential and commercial AC Level 2 ("L2") and DC fast charging ("DCFC") EV charging stations, cloud-based software applications, and related customer and driver services aimed at creating a robust EV charging ecosystem. ChargePoint's primary business model is not to own and operate charging stations ourselves, but to provide smart, networked charging solutions directly to businesses and organizations. ChargePoint is proud to partner with local businesses in New York to deploy and support EV chargers, such as Plug In Stations Online in Valatie, Apex Solar Power in Queensbury, INF Associates in New York City, and distributors such as Graybar and Cooper Electric that have locations from Buffalo to Long Island.

As one of the largest EV charging networks globally and an active participant in existing clean fuels programs, we can attest to the effectiveness of this policy. Where this policy exists today, in California, Oregon, and British Columbia, we are seeing faster transportation electrification and higher levels of private investment in charging infrastructure. That is because this policy reduces costs of charging infrastructure deployment and sends an effective signal to invest in EVs and charging stations. This supports the wide range of entities deploying charging infrastructure including, municipalities, small and large businesses, retailers, transit agencies, and fleet operators. In fact, over the past decade, clean fuels standards in the US have generated almost \$15 billion for clean fuels and infrastructure, including nearly \$2 billion for transportation electrification including EV charging stations and vehicle rebates.¹

A CFS will help New York reduce emissions from the transportation sector and reach the aggressive climate and transportation electrification goals of the Climate Protection Act, which requires NY to reduce economy-wide greenhouse gas emissions 40 percent by 2030 and no less than 85 percent by 2050 from 1990 levels.² Currently, New York remains 95+% reliant on petroleum in transportation, consuming 6.78 billion gallons of diesel and gasoline in 2019. To combat the reliance on petroleum,

¹ LCFS Data Dashboard - <https://ww2.arb.ca.gov/resources/documents/lcfs-data-dashboard>.

² New York Climate Protection Act, <https://climate.ny.gov/>.

New York has recently taken progressive action legislatively by setting a goal that all new passenger cars and light-duty trucks sold in the state are to be zero emission models by 2035. A similar target was set for medium and heavy-duty vehicles by 2045, if feasible. Charging infrastructure will be imperative for the vehicles sold, and CFS is just one policy that will assist in that acceleration. CFS will serve as a policy companion to other actions being taken in New York like electrifying school buses, the allocation of Make-Ready funding for charging infrastructure, funding for Charge Ready NY incentives, and EV Ready parking within building and energy codes.

Based on the experience and lessons learned from existing CFS across North America, A New York CFS can be designed to incorporate best practices such as:

- Infrastructure credits for DC fast charging stations, as implemented under California's program and included in Washington's draft rule, greatly incentivize investment in public DC fast charging. This provides additional support for electrification beyond standard crediting mechanism.
- Advanced credits for medium and heavy-duty electric fleet vehicles and infrastructure, as implemented in Oregon's program, help support accelerated fleet electrification.
- New York could also tailor carbon intensity (CI) targets under a CFS to long term climate goals under the Climate Leadership and Community Protection Act by setting steeper short and long-term CI targets thus ensuring fuels credited under the program have a path to zero emissions. This would be in line with recommendations by the Climate Justice Working Group to limit future reliance on fossil fuel infrastructure or allow emissions from fuel combustion to continue to disproportionately impact Disadvantaged Communities.

Lastly, CFS in California acts as an economic stimulus by creating business opportunities and attracting investment and jobs in clean transportation technology industries. Enacting a CFS in NY could have the same effect. California is home to a growing clean transportation technology industry that supports over 300 companies and 20,000 jobs in leading sustainable technologies such as alternative vehicle and vehicle component manufacturing, clean fueling infrastructure development, advanced feedstock research and development, and hardware/software companies that support the clean transportation sector³. Industry executives credit California's ambitious climate policies for the growth in these industries and expect growth to continue as demand for clean transportation grows and is supported by state policy. The other policies mentioned, such as EV Ready parking in building and energy codes and Make Ready funding have a similar affect in job creation. Labor-intensive jobs like preparing a site for an EV charging station require specific skills to lay the infrastructure needed to power the station. EV Ready codes require design professionals to consider EV charging sites when creating drawings for new parking garages or lots alongside buildings and homes. The policies create a positive domino affect when implemented that not only assist with energy goals, but also create new jobs for the state in the clean energy world.

ChargePoint urges the Climate Action Council to consider a CFS, and how a New York CFS can provide targeted support to electrification, as a part of a broader portfolio of policies to address transportation emissions in the state. We look forward to continuing to work with all stakeholders to accelerate the transition to electric and be a resource to decisionmakers who engage on the policies that will help get New York there.

³ *California's Clean Transportation Technology Industry*, August 2016. CALSTART.

Thank you,

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