

NYSERDA  
New York State Climate Action Council  
17 Columbia Circle  
Albany, NY 12203-6399

July 1st, 2022

RE: Public Comment to the New York State Climate Action Council Draft Scoping Plan

To Whom It May Concern:

Pursuant to the release of the New York State Climate Action Council (“CAC”) Draft Scoping Plan, Livingston Energy Group (“Livingston”) respectfully submits the following comments for your consideration. Thank you for the opportunity to do so.

As a New York-based energy and technology company that installs and manages electric vehicle (“EV”) charging systems, Livingston supports the New York State Climate Action Council Draft Scoping Plan. In our comments below, we highlight the urgent need to address transportation decarbonization. According to the New York State Department of Environmental Conservation (“DEC”), the transportation sector accounts for 28% of the State's greenhouse gas emissions. The transportation sector's electrification is needed to meet the New York State Energy Plan targets of reducing greenhouse gas emissions 40 percent below 1990 levels by 2030 and 85 percent below 1990 levels by 2050. New York State must increase EV adoption to meet transportation decarbonization and broad greenhouse gas emissions (“GHG”) reduction goals. To do so, the deployment of EV charging infrastructure is critical. Increased installation of publicly available charging infrastructure will help meet growing EV populations' needs, counter range anxiety concerns, and accelerate EV adoption across New York State.

Founded in 2016, Livingston provides a full suite of services and equipment for the installation and management of EV charging stations, the required power, and supporting infrastructure. The company is actively working with utilities and government agencies to assist organizations including municipalities, universities, school districts, institutions, developers, and owners of commercial, industrial, and high-density residential properties with the adoption of more efficient technologies, including supporting EV infrastructure. So far, Livingston has successfully deployed over 1,000 Level 2 and Direct Current Fast Charging (“DCFC”) stations in the US.



The EV stations we install can serve for both private and public charging, as well as fleet charging. In addition to the well-established charging station solutions currently offered, the company is actively committed to both hardware and software development, specifically aimed at improving both the station’s property owner and driver’s experiences. By incorporating various models of Level 2 and DCFC equipment with custom station management and e-mobility platforms, we are utilizing this unique position to pilot new equipment technology and software modules.

Livingston, through its Livingston Charge Port™ equipment and software solution, is dedicated to enabling the future of sustainable and cost-effective EV charging infrastructure and securing a robust EV charging network for all EV charging station owners, drivers, and stakeholders. We provide a variety of equipment accompanied by a warranty and a network solution, assisting customers in choosing the right equipment and ownership model for them.

## **7.2 Workforce Impacts and Opportunities**

Workforce training and development in the clean energy and transportation sector are crucial for both a thriving economy and a cleaner New York. As a New York business, we prioritize hiring from local communities. In making its recommendations for New York’s plan to reduce statewide emissions, we encourage the CAC to work closely with NYSERDA and the Department of Labor to support local clean energy workforce skill development. NYSERDA and the Department of Labor should work with NY companies operating in the clean energy and transportation sector and assist them through economic development grants in the design and implementation of training, technical assistance projects, and other support services tailored to develop a New York workforce needed for the maintenance and operation of the state’s EV charging infrastructure.

### **11.2 T1. Invest in and remove barriers for ZEV charging and fueling infrastructure**

While New York must dedicate resources to alternative fueling corridors, the CAC should augment its recommendations to ensure that, when siting such infrastructure, benefits both to through-drivers and local communities are maximized. In particular, the size and type of infrastructure should take into account both community needs and the local power sector infrastructure. It is important to note that not all EVs are currently equipped for DC fast charging. Therefore, we encourage the CAC and other government stakeholders to equally support the development and deployment of both Level 2 and DCFC stations. In future infrastructure plans and programs, the collocation of Level 2 and DCFC stations should always be considered. Support should continue being given to “Make Ready” and “Charge Ready” programs that encourage charging infrastructure deployment, and such support should be equally extended to both Level 2 and DCFC stations.



Demand charges are fees applied to the electric bills of commercial and industrial customers based upon the highest amount of power drawn during any (typically 15-minute) interval during the billing period.

Currently, demand charges represent a significant expense associated with operating DCFC stations. Demand charges are fees applied to the electric bills of commercial and industrial customers based upon the highest amount of power drawn during any interval during the billing period. This cost may deter customers unwilling to pay for such expensive electricity. The cost is simply too high to pass on to consumers in a way that generates a profit for site owners. In its Scoping Plan, the CAC should recommend the establishment, funding, and maintenance of incentives to offset demand charges in order to encourage the use and charging of EVs over higher-emitting transportation sources such as the internal combustion engine.

In many locations, new charging infrastructure will require major upgrades to local distribution networks and the high-voltage bulk transmission system. These upgrades can be mitigated through intentional approaches to reduce the impact of EV charging during times of high demand, including setting vehicle charging prices higher during demand periods to encourage charging during non-peak times and adopting smart charging technologies and programs that provide the opportunity for remote control over EV charging times and levels.

Public financing support is essential for increasing access to charging infrastructure for disadvantaged communities. Too often, these communities are left without adequate infrastructure, and New York should encourage the transition to EVs in these communities, which are often hardest hit by mobile GHG emissions sources. Affordable housing authorities have a keen interest in EV charging, but their resources are often constrained. Accordingly, the CAC should recommend mandatory funding for EV charging infrastructure in affordable housing that receives state subsidies and tax incentives. These communities and New York simply cannot afford to be left behind in the transition to cleaner transportation.

### **11.2 T1. Enhance ZEV awareness**

Prior to the deployment of charging infrastructure, communities should be involved in selecting charging station locations and be educated about EVs more generally. Communities along alternative fuel corridors, particularly those in rural locations, may not be familiar with the proposed infrastructure and may be reluctant to support its construction. Too often in considering EV infrastructure siting, undue emphasis is placed on the needs of utilities, fleets, and state and municipal governments. Property owners who might host, maintain, and operate charging stations are frequently regarded as secondary. The CAC should recommend ensuring that communities, property owners, and other under-represented stakeholders' needs are considered in the placement of EV infrastructure. Doing so will help ensure that State resources do not result in sunken costs and underutilized chargers.



We are confident that New York State together with the utility and private partners will be able to deliver reliable and equitable EV charging infrastructure for every EV driver in New York State. Please feel free to contact us if you have any questions that we can answer based on our industry experience.

Thank you for the opportunity to offer our feedback.

Sincerely,

Dragana Thibault

Director of Legal and Government Affairs

Livingston Energy Group

