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Draft Scoping Plan Comments

NYSERDA

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The New York Public Transit Association (NYPTA), which represents over one hundred municipally sponsored transit systems throughout New York State that operate more than 9,000 transit buses, welcomes the opportunity to provide comments to the Climate Action Council (CAC) on the CLCPA Draft Scoping Plan.

The public transportation industry has been a cornerstone of New York's environmental and energy goals for generations by delivering sustainable transportation services and providing affordable mobility alternatives. Public transit service is climate friendly - reducing the vehicle miles of travel from single occupancy vehicles and deploying cleaner energy solutions as they have become available including the transition to clean diesel fuel, compressed natural gas, and hybrid-electric propulsion technologies.

In 2020, the State directed the transit fleets of five large transit systems¹ to transition to electric vehicles, with an aggressive goal of having 25% of these transit bus fleets electrified by 2025, and 100% by 2035. In addition, the state's largest transit system, the MTA, has committed to a goal of purchasing only electric buses by 2029 and is retrofitting their facilities to accommodate these electric vehicles. Many other transit systems across the state have also begun purchasing or planning for electric or other zero-emission buses.

NYPTA commends the CAC for including in the draft Scoping Plan specific transportation policies and strategies that would increase the availability, accessibility, reliability, and affordability of public transit services across the state. In addition, the Scoping Plan recognizes and supports the benefits of changes in land use policies, site planning and transit-oriented development that will advance the efficiency of climate friendly transportation alternatives. Providing enhanced public transit service and making services easier to use by all members of our communities will provide significant benefits in helping the state achieve its statutory climate change goals as well as facilitate regional economic growth.

Facilitating the transition to zero-emission technologies, whether fleet electrification or some other technology, will require significant financial resources from all levels of government. While the draft Scoping Plan includes a discussion of transportation market based polices that if enacted, have the potential to generate some resources to help offset the significant increased

¹ Capital District Transportation Authority (CDTA), Niagara Frontier Transportation Authority (NFTA), Rochester-Genesee Regional Transportation Authority (RGRTA), Suffolk County Transit, and Westchester County Bee-line

cost to purchase all-electric transit vehicles, modify maintenance/storage facilities to accommodate vehicle charging, and provide access to sufficient and affordable electric power, there is no road map included in the Plan that ensures the necessary resources will be available when needed.

NYPTA urges the CAC to develop an implementation plan that details the specific resources necessary to fund the recommended transportation policies and strategies and a timeline for their enactment. Public transit system operations and capital investments are largely funded by the state, local, and federal government, and existing funds for these purposes are constrained. For public transit to be successful in meeting climate change strategies, funds are needed in the near term to begin early action steps to increase the availability of public transit service and address the extraordinary cost to transition vehicles and facilities to all- electric.

To successfully transition to all-electric fleets, in addition to purchasing vehicles, transit systems will need to:

- Retrofit existing bus facilities or construct new facilities to accommodate a 100% conversion to all-electric bus fleets including the required charging infrastructure;
- Access sufficient, affordable electric power to charge hundreds of buses simultaneously in one or more fixed locations and in some cases while vehicles are operating in revenue service; and,
- Connect to the electric grid where capacity exists or build out the utility grid at the sponsors expense, to support one or more bus facilities.

Experience to date has demonstrated that traditional demand-based electric rates will significantly increase the cost of electric vehicle operation and erode any assumed operational savings assumed in the draft Scoping Plan compared to current clean diesel and natural gas fueled vehicles. A recent Electrification Master Plan for the Capital District Transportation Authority found that current demand charging policies would result in demand charges making up one-half of future utility cost. A recent Fleet Electrification Study for Ulster County Area Transit found that lack of a time-of-day rate with their utility company made electric buses more expensive to operate relative to existing clean diesel buses. **Addressing the availability of sufficient and affordable electricity is a requirement for transition to all-electric vehicles.**

To help mitigate these issues, NYPTA respectfully requests that the draft Scoping Plan's near exclusive reliance on electrification should be revisited and that the draft Scoping Plan further assess the following impacts on municipally sponsored public transportation services:

- Availability of, access to, and the reliability of the electric grid to charge vehicles without disruptions to transit service or causing inefficient increases in fleet size to provide sufficient charged vehicles for service.
- Impacts of current demand charges on transit services and general cost escalations compared to other low-emission propulsion alternatives.



- Costs of transitioning transit facilities, equipment, and fleets to all electric energy sources.
- Readiness of the transit workforce to service and maintain all electric vehicles.
- Physical/geographic limitations in certain areas of the State.
- The fiscal impacts of utility ‘make ready’ costs on transition.
- Impacts of heavier battery electric vehicles on bus routes operating on weight restricted local roads and bridges.

As the draft Scoping Plan is refined based on public comment, NYPTA encourages the CAC to consider a hybrid approach for achieving the Climate Act’s ambitious goals, including but not limited to renewable natural gas and hydrogen energy sources as alternative means for further decarbonizing the public transportation sector.

Financing strategies to purchase zero-emission transit buses using future operating savings vs existing diesel buses, such as using Green Bank financing, are not a feasible or appropriate strategy for publicly subsidized transit systems. Diverting *potential* future operating savings will increase future transit operating subsidy needs. Furthermore, these future savings may not occur if future electric rates are not made affordable to public transit. It would be more appropriate to use any future operational savings to reduce subsidy needs, rather than finance electric bus purchases (given the higher risk and borrowing costs). Financing strategies such as the Green Bank may be appropriate for privately owned truck fleets or marine vessels, but not for public transit systems that do not control the level of most of their funding sources and rely on annual government budget decisions for most of their revenues.

In closing, investing in community-based transit serves many public benefits including supporting the state’s energy, environmental and climate change goals. Supporting the transition to all-electric transit vehicles with sufficient new investment and affordable electric rates will amplify these transit benefits, reduce emissions from the transportation sector, and support the goals of the Climate Leadership and Community Protection Act. The transition to electrification, however, should not result in municipalities having to choose between providing enhanced services or implementing new and innovative mobility alternatives with retrofitting vehicles, equipment, and facilities. Sufficient and sustainable resources need to be identified and available to support both the provision of enhanced public transit services and the recapitalization required to support the goals and strategies detailed in the draft Scoping Plan.

Sincerely,



Bill Carpenter, President

