



April 2, 2018

Paula Wilson
Idaho Department of Environmental Quality
1410 North Hilton Street
Boise, Idaho 83706

RE: Volkswagen Beneficiary Mitigation Plan

Dear Paula,

Greenlots appreciates the opportunity to provide the Department of Environmental Quality (DEQ) with comments on the State Volkswagen Beneficiary Mitigation Plan (BMP) and provides the following recommendations for funds disbursement.

Greenlots is a leading provider of electric vehicle (EV) charging software and services. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America. Greenlots' smart charging solutions are built around an open standards-based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic EV charging loads and respond to local and system conditions.

Greenlots is strongly supportive of DEQ's proposed investment of the full 15% allowable for light-duty EV charging infrastructure. This investment is critical to supporting EV adoption across Idaho. Maximizing investment in light-duty EV charging infrastructure complements other State initiatives, including the objectives of the Regional Electric Vehicle Plan for the West (REV West). The deployment of public charging stations can help indirectly incentivize the purchase and use of other zero emission vehicles. From a NOx reduction standpoint, light-duty vehicles are the most effective emissions segment to address with Environmental Mitigation Trust funds in terms of dollars spent per pound of NOx emission reductions. The 15% light-duty EVSE investment represents a critical step toward enabling long-term emissions reductions of NOx and greenhouse gases.

Although there are many worthy uses of Trust funds, Greenlots agrees that DEQ can generate the greatest impact by developing light-duty DC fast charging corridors, which can connect with the other REV West states and build out the State's designated alternative fuel highway corridors. Greenlots suggests that a secondary priority could be to install charging at destinations throughout the state (e.g., national parks, ski resorts) to further facilitate intrastate EV driving and tourism. The corridor chargers need to be DC fast chargers, to meet the needs of EV drivers who need to charge on the go, rather than where the car is parked for more than an hour or two. Level 2 charging will be important for locations with long-dwell times, such as at destination locations, workplaces, or fleet charging.

Greenlots encourages DEQ to devote the remaining 85% of Mitigation Trust funds toward electrification of the heavy-duty sector, particularly school and transit buses. Some of the many benefits of heavy-duty transportation electrification include: reduced operating costs from fuel and maintenance; increased vehicle longevity resulting from the electric motor; reduction of criteria air pollutants; health benefits for workers, passengers/schoolchildren, and community members; and reduction of greenhouse gases.¹ By investing in transit and school bus electrification, Idaho would be providing direct benefits to populations that may not directly benefit from home EV charging; heavy-duty charging provides both direct and indirect public health and social welfare benefits for transportation users and many surrounding communities—many of which tend to bear a disproportionate share of pollution (e.g., NO_x, SO_x, PM).

It will be important for DEQ to outline a transformative strategy in the Volkswagen Beneficiary Mitigation Plan that leads to long-term emissions reductions—this objective can only be achieved with wide-scale transportation electrification. DEQ should use a comprehensive approach to calculating cost effectiveness, that incorporates reduced fuel and maintenance costs from the electric engine, public health benefits, and emissions reductions benefits, over the lifetime of the vehicles and infrastructure.

Thank you for your consideration. Greenlots will be available as a resource to DEQ through the finalization and implementation of the Volkswagen Beneficiary Mitigation Plan. Please do not hesitate to contact me should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Ashley', with a stylized initial 'T' and 'A'.

Thomas Ashley
Vice President, Policy

¹ Edison Electric Institute. 2014.
http://www.eei.org/issuesandpolicy/electrictransportation/fleetvehicles/documents/eei_utilityfleetsleadingthearchive.pdf