

VW Phase 2 Mitigation Plan Comments

School Bus Related Comments

Key Themes: Recognize the vital role liquid fuels have historically played and will continue to play, and preserve affordability and reliability for consumers.

Commenters:

1. American Petroleum Institute – Southeast Region (API)
2. Blue Ridge EV Club
3. NC Electric Cooperatives
4. World Resources Institute
5. Sierra Club members
6. WNC Broadband Project
7. Carolina Solar Energy LLC
8. Advanced Energy (on behalf of Plug-in NC)

Individual Comments:

1. API
 - a. Consider the benefits of repowering your existing fleet with newer efficient diesel engines.
 - b. Adopt policies that permit all available fuel/vehicle technologies to compete in the marketplace for the consumer's resources.
 - c. Compare the environmental, economic, and performance attributes of new diesel engine and natural gas truck technology to alternatives such as battery electric trucks (BET) when developing transportation sector policies.
 - d. Opportunity to use VW funds to reduce pollution by replacing eligible engines and vehicles with newer models that make full use of ultra-low sulfur diesel (USLD).
 - e. If NC believes it is necessary to utilize an "alternative fuel", natural gas is a good choice.
2. Blue Ridge EV Club
 - a. Opposed to 100% funding for all fuel types for government owned eligible buses and privately owned school buses under contract with a public-school district.
3. NC Electric Cooperatives
 - a. Support for the prioritization of vehicle electrification projects
4. World Resources Institute
 - a. Supports 40% (\$27.2 million) for school buses in Phase 2
 - b. Should be devoting all school bus replacement funds to electric only
 - c. Leverage settlement funds with Infrastructure Investment and Jobs Act
 - d. Supports prioritization of diesel to electric for other vehicle types
 - e. Encourages outreach to school districts and convening of early adopters to mentor new school districts and help the transition to electric move efficiently
5. Sierra Club members
 - a. Support funding ZEV school buses, transit buses and state vehicle fleets
 - b. Support prioritization of electrification

- c. Recommend de-prioritizing alternative-fueled vehicles such as hybrids, compressed natural gas, and propane
- 6. WNC Broadband Project
 - a. What is the feasibility of using broadband-enabled electric buses to deploy high speed internet to underserved WNC residents; say using Wireless Internet Services via connected electric buses and cellular towers?
- 7. Carolina Solar Energy LLC
 - a. Support using settlement funds for school buses and municipal vehicles.
- 8. Advanced Energy (on behalf of Plug-in NC)
 - a. Only fund electric school buses at 100%

Transit Buses Related Comments

Key Themes: Recognize the vital role liquid fuels have historically played and will continue to play and preserve affordability and reliability for consumers.

Commenters:

1. American Petroleum Institute – Southeast Region (API)
2. NC Electric Cooperatives
3. Sierra Club Members
4. Carolina Solar Energy LLC

Individual Comments:

1. API
 - a. Consider the benefits of repowering your existing fleet with newer efficient diesel engines.
 - b. Adopt policies that permit all available fuel/vehicle technologies to compete in the marketplace for the consumer’s resources.
 - c. Compare the environmental, economic, and performance attributes of new diesel engine and natural gas truck technology to alternatives such as battery electric trucks (BET) when developing transportation sector policies.
 - d. Opportunity to use VW funds to reduce pollution by replacing eligible engines and vehicles with newer models that make full use of ultra-low sulfur diesel (USLD).
 - e. If NC believes it is necessary to utilize an “alternative fuel”, natural gas is a good choice.
2. NC Electric Cooperatives
 - a. Support for the prioritization of vehicle electrification projects
3. Sierra Club members
 - a. Support funding ZEV school buses, transit buses and state vehicle fleets
 - b. Support prioritization of electrification
 - c. Recommend de-prioritizing alternative-fueled vehicles such as hybrids, compressed natural gas, and propane
4. Carolina Solar Energy LLC
 - a. Support using settlement funds for school buses and municipal vehicles.

Heavy-Duty Equipment Comments

Key Themes: Recognize the vital role liquid fuels have historically played and will continue to play and preserve affordability and reliability for consumers.

Commenters:

1. American Petroleum Institute – Southeast Region (API)
2. NC Clean Cities
3. NC Electric Cooperatives
4. Sierra Club members
5. Carolina Solar Energy LLC

Individual Comments:

1. API
 - a. Consider the benefits of repowering your existing fleet with newer efficient diesel engines.
 - b. Adopt policies that permit all available fuel/vehicle technologies to compete in the marketplace for the consumer's resources.
 - c. Compare the environmental, economic, and performance attributes of new diesel engine and natural gas truck technology to alternatives such as battery electric trucks (BET) when developing transportation sector policies.
 - d. Opportunity to use VW funds to reduce pollution by replacing eligible engines and vehicles with newer models that make full use of ultra-low sulfur diesel (USLD).
 - e. If NC believes it is necessary to utilize an "alternative fuel", natural gas is a good choice.
5. NC Clean Cities
 - a. Support incentivizing zero emission vehicles.
 - b. Suggest separating cost share for new diesel and repowers for Class 8 trucks, Class 4-8 buses, and Class 4-7 trucks.
 - c. Including more alternative fuels, especially propane.
6. NC Electric Cooperatives
 - a. Support for the prioritization of vehicle electrification projects
7. Sierra Club members
 - a. Support funding ZEV school buses, transit buses and state vehicle fleets
 - b. Support prioritization of electrification
 - c. Recommend de-prioritizing alternative-fueled vehicles such as hybrids, compressed natural gas, and propane
8. Carolina Solar Energy LLC
 - a. Support using settlement funds for school buses and municipal vehicles.

ZEV Charging Infrastructure Comments

Key Themes: More ZEV charging needed. Support for using full 15% for ZEV charging infrastructure. Include evacuation routes in priority corridors, include redundancy for existing sites.

Commenters:

1. Blue Ridge EV Club
2. NC Clean Cities
3. ChargePoint
4. EVGo
5. NC Electric Cooperatives
6. Sierra Club members
7. Advanced Energy (on behalf of Plug-in NC)
8. Webform comments

Individual Comments:

1. Blue Ridge EV Club
 - a. Prioritization for electric vehicles and the full allocation of 15% for EVSE.
 - b. Support both public and private projects being eligible for the light-duty ZEV infrastructure program.
 - c. Encourage accelerated spending in placement along well travelled interstates (with redundancy if necessary) and major US highways.
 - d. We request that evacuation routes be incorporated into selection criteria for DCFC applications – potentially as a scoring bonus.
 - e. We encourage flexible pricing for charging stations (especially in the DCFC RFP) to allow site hosts to account for peak demand pricing and concerns.
 - f. We request that NCDEQ remain open to emerging technologies such as integrated battery storage in DC fast chargers when creating the phase II RFPs.
 - g. Incorporate the ‘intangible’ benefits of chargers (in the RFP) for an applicant -economic development, concerns about longevity for operating, charging
 - h. Prioritization of applicants where there were not awards in previous phases. There are some cases in which station redundancy would be beneficial for fleets and the public. In the case of DCFC, applicants and awardees from Phase I could deploy DCFC at a reduced cost due to the future proofing specifications required when installing during the first phase.
 - i. Earmarked funds for State Government under the “ZEV Infrastructure Program”.
2. NC Clean Cities
 - a. Suggest including all applications regardless of previous awards, especially for DCFC applications, to build redundancy
 - b. Add evacuation routes into selection criteria for DCFC
3. ChargePoint
 - a. Allocate more funding to Level 2 charging 60% DC Fast/40% Level 2
 - b. Require all charging stations to be networked
 - c. Require all charging station to be Energy Star certified
 - d. Level 2 rebate program should be simple and straightforward
 - e. Increase length of rebate voucher timeframe to 270 days
 - f. Offer fixed incentive amounts between \$5,000 - \$6,000 per port, not to exceed 60%, 80%, or 100% of total project costs.

- g. Eligible project costs should include installation costs, equipment costs, network agreements and maintenance agreements.
 - h. Give applicants 10 weeks to respond to RFP.
 - i. Allow applicants to request 80% of costs in application.
 - j. Require minimum of 50kW for DC Fast sites.
4. EVGo
- a. Give industry clear guidance on program launch timeline
 - b. Support environmental justice objectives by accounting for community charging use cases.
 - c. Utilize the scoring criteria from Phase1 to maintain balances, quantifiable project selection.
 - d. Require CHAdeMO per site, not per port.
 - e. Reward, but don't require higher power charging equipment.
 - f. Deploy funding quickly with several frequent small batches of funding versus one large "one and done" solicitation.
 - g. Allow electric vehicle service providers to build as risk prior to contract execution.
 - h. Include upgraded site in eligibility.
 - i. Reward low-cost efficiency, not high-sot share.
 - j. Standardize emissions saving estimates.
 - k. Incorporate lessons learned, documents from the Phase 1 contracting process into Phase 2.
5. NC Electric Cooperatives
- a. Support allocating the maximum 15% to ZEV infrastructure
 - b. Allow lower kW DC Fast chargers (31kW) in Phase 2
6. Sierra Club members
- a. Support maximum amount to ZEV charging
7. Advanced Energy (on behalf of Plug-in NC)
- a. Supports the earmarked funds for State Government under the "ZEV Infrastructure Program". Some members would like to request that an "EV purchase plan" or similar plan be submitted with the State Government applications to ensure that the reserved funds are effectively implemented.
 - b. Does not fully support the prioritization of applicants in counties that did not apply or were not awarded in Phase 1. There are some situations in which station redundancy would benefit fleets and the public. In the case of DC fast charging, awardees from Phase 1 could deploy additional stations at a reduced cost due to the future-proofing specifications required initially.
 - c. Requests that evacuation routes be incorporated into the selection criteria for DC fast charge applications, potentially as a scoring bonus.
 - d. Requests that NCDEQ allow flexible pricing for charging stations (especially in the DC fast charge RFP) to enable site hosts to account for peak demand pricing and concerns.
 - e. Requests that NCDEQ remain open to emerging technologies, such as integrated battery storage in DC fast chargers, when creating the Phase 2 RFPs.
 - f. Supports both public and private projects being eligible for the light-duty ZEV infrastructure program
8. Webform comments

- a. Use funds to place EV chargers at state parks and move many of the park vehicles to EV's.
- b. recommend that DC fast chargers funded through the VW mitigation mechanism include adapters for all EVs, including Tesla vehicles.
- c. EV charging rates should be regulated by government.
- d. More FAST DC charging infrastructure.
- e. These funds should be used to develop a charging infrastructure for EVs in NC.
- f. Support the portion of Phase 2 allocation for EV charging stations, particularly in underserved areas.
- g. The settlement funds should go towards building an electric vehicle infrastructure that would encourage rural dwelling North Carolinian's to also buy electric vehicles.
- h. Set money aside for adding EV charging to local businesses.
- i. Please provide additional assistance and look for ways to have public/private partnerships work together to bring EV charging to rural areas.
- j. For the DC fast charging stations, the ranking of applications should consider companies that have principal offices based in North Carolina versus companies with principal offices based in other states. The rationale is most companies based out of state are large corporations that can easily afford purchasing DC fast charging stations for their stores.
- k.

General Comments

Key Themes: Environmental Justice, Historically Under-resourced County Outreach Program, allocating 32% of funds in rural counties

Commenters:

1. Blue Ridge EV Club
2. NC Clean Cities
3. NC Electric Cooperatives
4. NC Sustainable Energy Association
5. Natural Gas Vehicle America (NGV America)
6. World Resources Institute
7. Sierra Club members
8. Webform comments
9. Murfreesboro Chamber of Commerce
10. Advanced Energy (on behalf of Plug-in NC)

Individual Comments:

1. Blue Ridge EV Club
 - a. We encourage that NCDEQ's environmental justice stakeholders be listed to foster more collaboration among communities and stakeholders.
 - b. Support Historically Under-Resourced Counties Outreach Program.
2. NC Clean Cities

- a. Support for including EJ stakeholders.
 - b. Support outreach to under-resourced communities.
 - c. Re-evaluate differences in cost-share allocations from government and non-government projects.
 - d. RFPs for Phase 2 be released incrementally to allow for emerging technology.
 - e. Encourage continued relationships with EJ and HURCOP areas after project completion.
 - f. Request other metrics be explored to quantify EJ to determine project awards.
3. NC Electric Cooperatives
 - a. Support 32% funding allocation to rural counties
 - b. Support the inclusionary goal for all communities
 - c. Support final plan which provides DEQ the flexibility to work collaboratively with stakeholders
 - d. Project selection and funding questions are not addressed in the plan, but need to be addressed prior to RFP release
 4. NC Sustainable Energy Association
 - a. Utilize the scoring criteria from phase 1
 - b. Clear and streamlined timelines and contract execution
 - c. Ensure compliance with documented Environmental Justice Plan
 5. NGV America
 - a. Include AFLEET for GHG emissions calculations
 - b. NGV are ready now whereas EV's, especially for MHD, are not widely available
 - c. Suggest that NGV may be an option for EJ and HURCOP communities
 - d. Including more alternative fuels, especially natural gas
 - e. GHG reductions are more important than NOx
 6. World Resources Institute
 - a. Supports focus on EJ communities with both outreach and project selection process scoring
 7. Sierra Club Members
 - a. Use lifetime cost of ZEV versus a fossil-fuel powered vehicle
 8. Webform comments
 - a. support incentivizing zero emission vehicles and outreach to under-resourced communities.
 - b. Recommend adding to your mitigation strategy the elimination of older fleet vehicles powered with diesel engines with updated technology and alternative fuels.
 - c. VW money needs to be available to the public more that it is today. Since the reason for the VW decried is based off diesel vehicles purchased by residents of NC, why is the money focused on governmental needs.
 - d. Counties not included in underserved county outreach program.
 - e. Since the reason for the VW decried is based off diesel vehicles purchased by residents of NC, why is the money focused on governmental needs?
 9. Murfreesboro Chamber of Commerce
 - a. Please consider rural, Tier 1 areas in this next phase at 100% re-imbusement.
 10. Advanced Energy (on behalf of Plug-in NC)
 - a. Recommends that NCDEQ's environmental justice stakeholders be listed to foster more collaboration among communities and stakeholders.

- b. Supports the ability to leverage other funding sources so long as it does not cause unreasonable delays in naming awards or distributing funding and that utility pilot and programs also be including as additional funding sources

Comments that are not applicable or allowed by consent decree

1. What is the feasibility of using broadband-enabled electric buses to deploy high speed internet to underserved WNC residents; say using Wireless Internet Services via connected electric buses and cellular towers?
 2. Is this government distributed funding meant to be a money-making venture for the participants?
 3. EV charging rates should be regulated by government.
 4. It would be helpful if fast chargers (independent of the bus purchase) would be accepted as an eligible for the grant funds.
 5. I am wanting to put a pedestal charger in the city right of way in the Dilworth neighborhood of Charlotte. Ideally, we would reserve the spot for EV charging. This is a residential neighborhood. I would like a small grant to pay for the charger, permits, and materials for running the power. I would supply the labor, the connection to my house, and the power. Ideally there would be some technology available to share the cost of the power in a model that isn't for profit. This is a fairly wealthy neighborhood; however this is an initiative to reduce carbon, and these are the people who will be buying EVs.
- b. The City of Wilmington requests Clause 6a on page 26 offer either:
 - a. an exclusion for class 4-7 refuse vehicles or,
 - b. for class 4-7 refuse vehicles, the eligible trucks include 2012 to 2016 engine models