

May 24, 2024

Honorable Carl E. Heastie
Speaker of the Assembly
New York State Assembly
NYS Capitol Building
Albany, NY 12224

Honorable Deborah J. Glick
Chair, Committee on Environmental Conservation
New York State Assembly
LOB 621
Albany, NY 12248

Re: Assembly Bill 964-A

Dear Speaker Heastie and Chair Glick:

The undersigned electric vehicle charging service providers (EVSPs) write to express our strong support for Assembly Bill 964-A to implement a Clean Fuels Standard (CFS) in New York. We applaud the state of New York for their ambitious goals to reduce greenhouse gas (GHG) emissions under the Climate Leadership and Community Protection Act (CLCPA), the Advanced Clean Cars II rule, and the Advanced Clean Truck rule. Since the passage of the CLCPA in 2019, New York has made great advancements and investments in the clean energy transition. Despite this progress, the transportation sector remains the leading source of criteria pollutant and GHG emissions in the state. By becoming the first state on the East Coast to pass a CFS, New York State would emerge as a leader that other states may follow in implementing their own clean fuels programs to reduce transportation emissions, improve air quality, and stimulate economic development.

A CFS is a proven and effective policy that supports the adoption of light-duty as well as medium/heavy-duty EVs. By setting increasingly ambitious carbon intensity reduction targets for transportation fuels that reward the use of low carbon fuels like electricity, a CFS program provides a clear and effective market signal that bolsters private investment in EV charging across the state and offsets high operating costs of DCFC infrastructure. Increased deployment of charging infrastructure driven by the CFS will provide New Yorkers with more accessible and convenient charging options, promote greater EV adoption, and further reduce transportation sector emissions. Further, a CFS will stimulate local economic and job growth through increased investment in clean technologies. EV charging station deployments require site planning and development, construction, engineering, and electrician services—all of which support jobs in the local economy. This aligns with New York City's Green Economy Action Plan to position New Yorkers for the emerging growth of net new jobs in the green economy.¹

¹ *Green Economy Action Plan* (February 2024), New York City Economic Development Corporation, <https://edc.nyc/sites/default/files/2024-02/NYCEDC-Green-Economy-Action-Plan-02-28-24.pdf>

These numerous benefits of a CFS have already been demonstrated in California, Oregon, and Washington where EV adoption rates are the highest in the nation. For example, California's Low Carbon Fuel Standard (LCFS) has created a \$4 billion annual market for low-carbon fuels in the state, with an estimated \$1 billion in LCFS credits generated from EV charging alone.² This has contributed to the widespread deployment of over 11,000 fast charging ports in California.³ Further, since the LCFS's implementation in 2011, 25 billion gallons of petroleum fuels and reduced the carbon intensity of California's transportation fuels by nearly 13%.⁴ This provides a compelling example of the potential benefits for New York.

In conclusion, we thank the Assembly for consideration of these comments and urge the state of New York to expeditiously pass A.964-A to support electrification, improve public health, and foster economic growth in its clean energy sector.

Sincerely,

Katelyn Lee
Sr. Associate, Market Development & Public Policy
EVgo

Emily Kelly
Sr. Manager, Public Policy
ChargePoint

Daniel Bloom
Public Affairs Manager – US East
FLO EV Charging

Anthony Willingham
Government Affairs & Public Policy Lead – State Government
Electrify America

Joe Nickerson
Government Affairs
BEAM

Brian Ross
Advocacy Lead – East
bp pulse Americas

² California Air Resources Board, *California Low Carbon Fuel Standard Workshop* [Slides] (April 10, 2024), <https://ww2.arb.ca.gov/sites/default/files/2024-04/LCFS%20April%20Workshop%20Slides.pdf>.

³ US Department of Energy, Alternative Fuels Data Center May 2024 Data; https://afdc.energy.gov/stations#/analyze?country=US®ion=US-CA&fuel=ELEC&ev_levels=dc_fast.

⁴ *California Low Carbon Fuel Standard Workshop* [Slides] <https://ww2.arb.ca.gov/sites/default/files/2024-04/LCFS%20April%20Workshop%20Slides.pdf>.