



June 25, 2021

VIA ELECTRONIC FILING

Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Public Utilities Regulatory Authority
Ten Franklin Square
New Britain, CT 06051

RE: PURA Investigation Into Distribution System Planning of the Electric Distribution Companies—Zero Emission Vehicles, Dkt. No. 17-12-03RE04, Letter in Lieu of Written Exceptions

Dear Mr. Gaudiosi,

The Sierra Club respectfully submits this Letter in Lieu of Written Exceptions to the Public Utilities Regulatory Authority (PURA) in response to the Proposed Final Decision and Notice of Written Exceptions, Briefs and Oral Arguments and Request for Written Comments in Docket No. 17-12-03RE04 PURA Investigation Into Distribution System Planning of the Electric Distribution Companies—Zero Emission Vehicles.

The Sierra Club strongly supports PURA's Proposed Final Decision to implement a comprehensive utility electric vehicle (EV) charging infrastructure program that will enable Connecticut to overcome challenges to EV charging infrastructure deployment, support the state's transition to electric vehicles, and set the state on course to meet its climate commitments. As the Authority has recognized, electrification of the transportation sector is critical to achieving Connecticut's climate targets set by the Global Warming Solutions Act (GWSA) to reduce emissions 45 percent by 2030 and 80 percent by 2050. The program will help enable Connecticut to achieve its EV deployment targets set through the state's participation in the State Zero-Emission Vehicle Programs Memorandum of Understanding (ZEV MOU), and through the Governor's Council on Climate Change (GC3) planning process. Pursuant to the multi-state Zero Emission Vehicle Memorandum of Understanding (ZEV MOU), Connecticut has committed to deploy between 125,000-150,000 EVs by 2025 and the GC3 has further recommended that the state increase EV adoption to 500,000 by 2030.¹

The Sierra Club commends the comprehensive scope of the EV charging infrastructure program, including features to address multi-unit dwellings, workplace charging, fleets, direct current fast charging (DCFC), the transportation needs of low- to moderate-income (LMI)

¹ Building a Low Carbon Future for Connecticut: Achieving a 45 Percent GHG Reduction by 2030: Recommendations from the Governor's Council on Climate Change, December 18, 2018.

residents, the challenge posed by demand charges, load management, and customer education and outreach, among others. In addressing these critical market segments and barriers to EV charging infrastructure deployment, Sierra Club believes the program will be successful in supporting the development of a thriving EV charging infrastructure ecosystem in Connecticut. In particular, Sierra Club applauds the Authority for adopting the stakeholder recommendation to scale up the electric vehicle supply equipment (EVSE) deployment target to reflect the level of EVSE necessary to support the GC3-recommended goal of 500,000 EVs by 2030. Sierra Club also commends the incorporation of a two-tiered managed charging program featuring an advanced direct load control offering to effectively promote grid reliability and smooth EV load.

Sierra Club encourages PURA as soon as possible to build on the success of this light-duty EV program and begin exploring solutions to support electrification of medium- and heavy-duty vehicles. Such action is critical to meeting the state's climate commitments as well as the state's commitment under the Multi-State Medium- and Heavy-Duty Zero Emission Vehicle Memorandum of Understanding to pursue a goal of at least 30 percent of new medium- and heavy-duty sales to be zero emission vehicles by 2030. Developing a plan for electrification of medium- and heavy-duty vehicles will also help to share the benefits of electrified transportation with LMI communities, both through enabling electrification of public transit fleets and in alleviating the pollution burden resulting from medium- and heavy-duty internal combustion engine vehicles.

Sierra Club reiterates its strong support for the EV charging infrastructure program presented in the Proposed Final Decision and looks forward to continued engagement with PURA and stakeholders as this essential program is implemented. Sierra Club does not request oral argument on the Proposed Final Decision but reserves the right to participate should oral argument be scheduled at the request of another party.

Sincerely,

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cc: Service List

CERTIFICATE OF SERVICE

This is to certify that on this 25th day of June, 2021, the foregoing document was filed with the Public Utilities Regulatory Authority, and copies of the foregoing document were served upon each person designated on the Authority's official service list the applicable proceedings in accordance with R.C.S.A. Section 16-1-15.

/s/ Sarah Krame

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