Pennsylvania House Transportation Committee
Hearing on House Bill 1446
November 10, 2017

Written Comments of the Pennsylvania Environmental Council

Submitted by
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On behalf of the Pennsylvania Environmental Council (PEC), thank you for the opportunity to submit these written comments on House Bill 1446 (P.N. 1916) to the House Transportation Committee. This legislation seeks to advance strategic deployment of electric vehicle (EV) infrastructure.

At present, EV charging stations are being installed ad hoc by public and private entities. These well-intentioned efforts offer limited benefit, however, because EV deployment at scale depends on a strategic network of charging infrastructure. House Bill 1446 seeks to address this problem by (1) instructing the Governor to establish a statewide and/or regional goals for EV expansion; and (2) requiring electric distribution companies (EDCs) that serve priority areas, as defined by the bill, to develop a framework for EV infrastructure deployment in order to meet the statewide and/or regional goals.

We offer the following comments for improving the legislation:

- The existing bill may be strengthened through the insertion of language that clarifies the extent to which the EDC builds out charging infrastructure and the point at which the market takes over. PEC firmly believes that when market conditions allow for private industry to provide a service, that approach is preferable. The EV expansion framework developed under this bill will provide the backbone of the system, enabling market players to build off of it.

- Section 2816(b)2 should be amended to require EDCs to include representation from the regional transportation planning organization(s) active in the priority area being addressed by the framework, in addition to those otherwise listed.

- We question provisions in the legislation related to natural gas fueling assessment and infrastructure. At a minimum, the proposed assessment should be more narrowly focused on fleet applications -- particularly those operating in densely populated areas where there are corresponding health benefits of reduced air pollution.

  Increasing deployment of natural gas fueling infrastructure will require significant investment and build out, including the placement and construction of infrastructure necessary to provide the resource at new fueling stations.

  In addition, PEC is concerned about locking Pennsylvania to infrastructure choices that maintain ongoing emissions of greenhouse gasses (GHG). The most oft-cited

modeling system for natural gas vehicles shows there is only a reduction in emissions of 6 to 11%, compared to traditional fuels.[1] Further, recent peer-reviewed publications by Carnegie Mellon University researchers found that natural gas vehicles may emit GHGs at the same level as gasoline and diesel vehicles, once life cycle emissions are accounted for.

- We believe the installation requirements of Section 8124(a) are premature and should be postponed until the completion of the EV framework development and natural gas vehicle assessments called for by this legislation. If this requirement is included in the final legislation, installation should be limited to those welcome and rest areas where full service stations already exist. The costs and impacts related to infrastructure build out at every welcome area and rest area likely outweigh the benefits when these options can be provided at established locations.

Benefits of EVs

EVs offer several potential environmental benefits. Because zero-emissions electricity generation options are more readily available than zero-emissions fuels, electrifying transportation allows for deeper carbon cuts at a faster pace and less cost. These zero-emissions electricity sources can include renewables, nuclear, or fossil energy equipped with carbon capture and storage.

In addition, EVs can play a role in a clean energy transition. Batteries can double as energy storage, discharging power onto the grid during times of high demand, and charging when energy demand, and therefore prices, are lower.

Regardless of the source of the electricity used, EVs have the potential to improve health and reduce air pollution by transferring a mobile emissions source, that releases pollutants in local communities and neighborhoods, into a point source that can be more easily measured and managed.

Thank you for the opportunity to share our thoughts on this legislation. We would welcome the opportunity to discuss these issues further.

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[1] Testimony of W. Michael Griffin, Carnegie Mellon University, House Democratic Policy Committee meeting, March 21, 2016. http://wallaby.telicon.com/pa/library/2016/20160321TD.pdf