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Senator Pete Harckham, Senate Committee on Environmental Conservation
Senator Liz Krueger, Senate Committee on Finance
Senator Kevin Parker, Senate Committee on Energy and Telecommunications

Dear Chair Harckham, Chair Krueger, and Chair Parker:

ChargePoint appreciates the opportunity to submit testimony today regarding the implementation of the Climate Action Council Final Scoping Plan. We applaud the legislature for passing the CLCPA, and Climate Action Council for including a Clean Fuel Standard (CFS) in the Final Scoping Plan and encourage you to implement the program by passing A962/S1292 sponsored by Assemblywoman Carrie Woerner and Senator Kevin Parker. As you may know, the transportation sector is the second-largest source of greenhouse gas emissions in New York State, accounting for 36% of the state's global warming pollution. A CFS will address this and can do so in a way that is in line with New York's long-term goal of 100% transportation electrification¹. With a CFS, New York can build a market to aid the transition to clean fuels, reduce reliance on fossil fuels, improve public health, and help the state reach its climate goals without state tax funding.

By way of background, ChargePoint is the nation's leading electric vehicle ("EV") charging network. ChargePoint internally designs, develops, and deploys residential and commercial AC Level 2 ("L2") and DC fast charging ("DCFC") EV charging stations, cloud-based software applications, and related customer and driver services aimed at creating a robust EV charging ecosystem. ChargePoint's primary business model is not to own and operate charging stations ourselves, but to provide smart, networked charging solutions directly to businesses and organizations. ChargePoint is proud to partner with local businesses in New York to deploy and support EV chargers, such as Plug In Stations Online in Valatie, Apex Solar Power in Queensbury, INF Associates in New York City, and distributors such as Graybar and Cooper Electric that have locations from Buffalo to Long Island.

A CFS is a performance-based standard that will help New York reduce emissions from the transportation sector and reach our aggressive climate goals. Currently, New York remains 95+% reliant on petroleum in transportation, consuming 6.78 billion gallons of diesel and gasoline in 2019. We need to adopt policies that will speed up our transition to electric vehicles and clean fuels. Speaking from experience in other CFS markets, we can attest to the fact that a clean fuel standard policy will drive significant investment in EVs and EV charging infrastructure across the state, help transition New York towards a new clean energy economy, and reduce pollution from transportation.

As one of the largest EV charging providers in North America and an active participant in existing clean fuels programs, we can directly attest to the effectiveness of this policy. Where this policy exists today, in California, Oregon, and British Columbia, we are seeing faster transportation electrification and higher levels of private investment in charging infrastructure. That is because this policy reduces the

¹ The Final Scoping Plan states that, "The (CFS) program should be designed to ensure long term electrification by instituting a long trajectory for carbon intensity reductions out through 2050, a term which would send clear price signals that indicate when combustion fuels would cease generating credits."

operational costs of charging infrastructure and sends an effective signal to invest in EVs and charging stations. This holds true for individual drivers, transit agencies, and fleet operators. In fact, over the past decade, clean fuels standards in the US have generated almost \$15 billion for clean fuels and infrastructure, including nearly \$2 billion for transportation electrification including EV charging stations and vehicle rebates.

Under the clean cars and trucks bill passed last year in NY, internal combustion engine vehicles will not be eligible for sale after 2035 for light duty and 2045 for MHD vehicles. A clean fuel standard will help with this transition to zero emission vehicles and is an important tool in our toolkit of policies that can help NY meet the ambitious climate goals that it has set. A CFS also complements an economywide cap-and-invest program, which is at the heart of the Climate Action Council Final Scoping Plan. By stimulating early innovation and private investment in clean fuels and infrastructure, it helps mitigate costs under a cap-and-invest program down the road.

Lastly, the CFS in California acts as an economic stimulus by creating business opportunities and attracting investment and jobs in clean transportation technology industries. Enacting a CFS in NY could have the same effect. California is home to a growing clean transportation technology industry that supports over 300 companies and 20,000 jobs in leading sustainable technologies such as alternative vehicle and vehicle component manufacturing, clean fueling infrastructure development, advanced feedstock research and development, and hardware/software companies that support the clean transportation sector². Industry executives credit California's ambitious climate policies for the growth in these industries and expect growth to continue as demand for clean transportation grows and is supported by state policy.

In conclusion, we thank you for your dedication to the implementation of the Climate Action Council Final Scoping Plan and strongly encourage the legislature to act now and take up legislation sponsored by Senator Parker and Assemblywoman Woerner creating the Clean Fuel Standard which will immediately start reducing pollution from fossil fuels and encourage decarbonization, including electrification.

Sincerely,



Emily Kelly
Manager, Public Policy - Eastern Region
ChargePoint

² *California's Clean Transportation Technology Industry*, August 2016. CALSTART.