

Notice of Request for Information (RFI) Connecticut Electric Bicycle (E-Bike) Incentive Program Summary

The Department of Energy and Environmental Protection (DEEP) issued a request for information on July 6, 2022 and held the response period open until July 27, 2022.

In all, twenty-one (21) responses were received. This document summarizes all responses received and is organized by questions outlined in the Request for Information.

Question 1: What are the best practices from other E-bike incentive programs? Including, but not limited to:

Responses to this question were received from: Ashley Seaward (People for Bikes), Chris D'Antonio, Dante Pace, David Gutelius, Gannon Long (Operation Fuel), Jim Head, Kate Rozen, Kerri Provost, Paul Wessel (Greater New Haven Clean Cities Coalition (GNHCCC)), Robyn Marquis (CALSTART).

- a. Application processes (both on-line and in-person)
 - Seven respondents (Chris D'Antonio, Dante Pace, Gannon Long (Operation Fuel), Jim Head, Kate Rozen, Kerri Provost, Paul Wessel (GNHCCC), Robyn Marquis (CALSTART)) indicated that the least burdensome application process would be structured as a point-of-sale or instant rebate at the point-of-purchase particularly for purchases made at local bike retailers. A post sale or post-purchase rebate and/or voucher was discussed by several respondents for online E-bike retailers.
 - Four respondents (Chris D'Antonio, Dante Pace, Gannon Long (Operation Fuel), Robyn Marquis (CALSTART)) also recommended building and maintaining relationships/partnerships with E-bike retailers (local and online), shops, and companies (such as electric scooter manufactures) already operating within the state.

b. E-bike Applicability

- Four respondents (Ashley Seaward (People for Bikes), Dante Pace, Jim Head, Kate Rozen) indicated support for all types and forms (i.e. cargo, leisure, e-Mountain Bikes) of E-bikes and/or those that are categorized into the three class system (Class 1-3) as defined in Public Act 18-165.
- Two respondents (Dante Pace, Kate Rozen) mentioned either a fluctuating or the removal of an E-bike MSRP cap. (NOTE: MSRP cap is set by statute)
- One respondent (Dante Pace) discussed the benefits of ancillary program considerations such as a state e-bike registry, offering annual checkups/tune-ups, allowance of third-party modifications, and incentivizing future E-bike technology improvements (i.e. hybrid gas/electric fuel technology).

c. E-Bike retailer selection and inclusion

- Four respondents (Chris D'Antonio, Dante Pace, Kate Rozen, Robyn Marquis (CALSTART)) stated support for the inclusion of locally based as well as online retailers and shops.
- One respondent (Dante Pace) specified a desire for the fair inclusion of "low" and "high" end retailers.
- One respondent (Kate Rozen) provided a link to the <u>Denver E-bike program retailer</u> registration application. (https://us.openforms.com/Form/7fbe0485-f015-42c7-b236-5ea98bdfdb2a).
- d. Opt-in for customers to authorize contact by E-bike vendors

- One respondent (Dante Pace) expressed discomfort with intrusive solicitation without explicitly opting-in through a DEEP mailing list, a local bike retailer or optional state registry.
- One respondent (Gannon Long (Operation Fuel)) supported contacting individuals that are categorically eligible through their participation in state programs (i.e. Operation Fuel) and or residents of Environmental Justice Communities (EJCs). The respondent recommended DEEP collaborates with other state agencies (Department of Social Services, Department of Children and Families) to inform and enroll eligible individuals in the E-bike program.
- One respondent (Kate Rozen) supported the communication opt-in as a means to inform program participants of recalls.

e. E-bike Incentive levels

- One respondent (Gannon Long (Operation Fuel)) recommended that "DEEP announce as soon as possible that EJC residents, Operation Fuel clients, and other categorically eligible residents can qualify for an E-bike voucher up to \$1000, compared to the standard benefit of \$500."
- One respondent (Kate Rozen) recommended "\$500 for everyone, \$750 for non-income qualified residents in environmental justice communities, and \$1,000 for low-income individuals who qualify."
- One respondent (Robyn Marquis (CALSTART)) stated in part that "one approach could be a tiered structure with one pathway for income-restricted applicants that funds a larger share of the E-bike, and a separate pathway with no income cap and a lower voucher amount."

f. LMI income verification

- Three respondents (Gannon Long (Operation Fuel), Paul Wessel (GNHCCC), Robyn Marquis (CALSTART)) indicated support for the use of categorical eligibility based on participation in state or federal assistance programs. In conjunction, one respondent (Paul Wessel (GNHCCC)) supports compliance checks to ensure self-reported income aligns with income eligibility requirements.
- Two respondents (David Gutelius, Kerri Provost) recommended the use of state of federal income tax returns for income verification.
- One respondent (Dante Pace) supported using an individual's most recent paycheck to verify income.
- One respondent (Kate Rozen) stated that any income verification process used should be as easy as possible with few steps required.

g. Participant surveys.

- Four respondents (Dante Pace, Jim Head, Kate Rozen, Paul Wessel (GNHCCC)) were supportive of using surveys to gather information on programmatic effectiveness.
- One respondent (Dante Pace) suggested the use of additional incentives to encourage survey participation.

• One respondent (Paul Wessel (GNHCCC)) recommended the use of app-based data collection with the caveat of mitigating for possible flaws in self-reported information.

Question 2: How should DEEP determine the air quality benefit from program participation?

Responses to this question were received from: Ashley Seaward (People for Bikes), Dante Pace, Gannon Long (Operation Fuel), Jim Head, Kate Rozen, Paul Wessel (GNHCCC)), Robyn Marquis (CALSTART), Thomas Regan-Lefebvre (Center for Latino Progress).

- Six respondents (Ashley Seaward (People for Bikes), Dante Pace, Jim Head, Kate Rozen, Paul Wessel (GNHCCC), Robyn Marquis (CALSTART)) favored the use of applications (apps), surveys, or other self-reported means used, voluntarily, by program participants to compile vehicle miles traveled (VMT) to determine air quality benefits. Additionally, one respondent (Thomas Regan-Lefebvre (Center for Latino Progress)) recommended collaboration with modeling experts from TRECH (https://www.hsph.harvard.edu/c-change/subtopics/trechproject/) to help determine air quality and health benefits.
- One respondent (Gannon Long (Operation Fuel)) advocated collaborating with local organizations and measuring the air quality difference between using cars and replacing cars with e-bikes with a focus on EJCs (Waterbury, Bridgeport, New Haven, and Hartford).

Question 3: How many manufacturers produce E-bikes with a base MSRP of \$3,000 or less? Please include contact information, if available.

Responses to this question were received from: Dante Pace, Gannon Long (Operation Fuel), Jim Head, Kate Rozen, Tiffany Chang (Brompton Bicycle Ltd.).

- Three respondents (Dante Pace Jim Head, Kate Rozen) provided the following manufacturers: Alien Rides Aventon, Blix, Canondale, Hurley, Juiced Bikes, Lectric, Rad Power, Santa Cruz, Surfas, Trek, Velowave.
- One respondent (Gannon Long (Operation Fuel)) stated that local bike shops and their owners/staff are key stakeholders that should be engaged and encouraged to participate.
- One respondent (Tiffany Chang (Brompton Bicycle Ltd.)) commented that "Brompton Bicycle produces two Electric bike models the C Line Electric and P Line Electric. The C Line Electric has an all-steel frame at \$3,850 MSRP and P Line Electric has a titanium rear frame at \$4,700 MSRP."

Question 4: How many E-bike retailers are there in Connecticut? Please include contact information, if available.

Responses to this question were received from: Ashley Seaward (People for Bikes), Dante Pace, Jim Head, Kate Rozen, Tiffany Chang (Brompton Bicycle Ltd.).

- Three respondents (Dante Pace, Jim Head, Tiffany Chang (Brompton Bicycle Ltd.)) provided the following Connecticut based E-bike retailers: Best Buy, BiciCo, Bloomfield Bicycles, Central Wheel, College Street Cycles, Devils Gear Bike Shop, New Canaan Bicycles, REI.
- One respondent (Ashley Seaward (People for Bikes)) stated that a collaborative approach with retailers and asking retailers to register for the program as participants would provide contact information at each retailer.

 One respondent (Kate Rozen) provided a list compiled from People for Bikes (https://docs.google.com/spreadsheets/d/1sL8ENBr98215xCkrdW1DzXcPnYyHtgwJtgve335xdps/edit?usp=sharing)

Question 5: How many E-bike retailers are there in on-line? Please include contact information, if available.

Responses to this question were received from: Ashley Seaward (People for Bikes), Dante Pace, Jim Head, Kate Rozen, Tiffany Chang (Brompton Bicycle Ltd.).

- Two respondents (Ashley Seaward (People for Bikes), Kate Rozen) supported including all retailers who are interested in participating in the program.
- One respondent (Jim Head) mentioned ordering an E-bike from RadPower and considering Juiced Bikes.
- One respondent (Tiffany Chang (Brompton Bicycle Ltd.)) provided the following link to Brompton Bicycles: www.us.brompton.com.

Question 6: What is the industry standard E-bike warranty?

Responses to this question were received from: Dante Pace, Jim Head, Tiffany Chang (Brompton Bicycle Ltd.).

- Two respondents (Dante Pace, Jim Head) mentioned that warranties may vary from one to three years and by manufacturer, component, and/or batteries.
- One respondent ((Brompton Bicycle Ltd.)) stated the following. "Our standard Brompton warranty for e-bikes is a 7-year unlimited mileage warranty against manufacturing and material defects for the main frame components, commencing from the date of sale. Other non-wearing parts on the bicycle (e.g. crank arms, brake calipers, mudguards, etc.) are covered by a 3-year warranty against manufacturing and material defects. Full warranty terms and conditions are here

 $(\underline{https://trade.brompton.com/Uploads/Content/Customer_Service/Warranty/Warranty\%20Ter_ms\%20and\%20Conditions.pdf)."$

Question 7: What is the best industry E-bike warranty?

Responses to this question were received from: Dante Pace, Jim Head.

• One respondent (Dante Pace) stated that Pedego has a 5-year warranty on their bike and components and a three-year prorated warranty on their batteries. Relatedly, one respondent (Jim Head) mentioned a one-year warranty with RadPower.

Question 8: What other E-bike customer experiences should DEEP take into account? (e.g., return policy? Battery reuse or recycling programs)

Responses to this question were received from: Dante Pace, Gannon Long (Operation Fuel), Jim Head, Kate Rozen, Robyn Marquis (CALSTART), Tiffany Chang (Brompton Bicycle Ltd.).

- Respondents touched on a number of issues for consideration listed in part and in no particular order:
 - Return/refund policies, infrastructure, car/bicycle parking, speed of traffic, proximity to amenity/attractions, battery recycling, bicycle operating safety, weight of e-bikes,

bike racks on public transit, quality and safety of e-bikes, customer accessories, a single point of contact, etc.

Question 9: How often are E-bike purchases financed?

Responses to this question were received from: Dante Pace, Jim Head, Kate Rozen, Tiffany Chang (Brompton Bicycle Ltd.).

- Two respondents (Dante Pace, Jim Head) did not finance their e-bike purchases but are aware of the financing options available at certain retailers (i.e. Bloomfield Bicycle reportedly has a 12-month interest free financing option). Additionally respondent (Dante Pace) mentioned that insurance policies (personal injury, property damage/theft) may be available.
- One respondent (Kate Rozen) spoke of her experience purchasing an E-bike from Radpower Bikes and using Affirm to finance her purchase. Respondent Rozen also mentioned a local credit union Connex that offers e-bike financing that includes the purchase of accessories.
- One respondent (Tiffany Chang (Brompton Bicycle Ltd.)) stated that Brompton "has implemented Klarna financing in June 2022, we've noticed 29% of sales are from our Electric bikes."

Question 10: How should DEEP define "maximum income eligibility" for e-bikes?

Responses to this question were received from: Dante Pace, Gannon Long (Operation Fuel) Jim Head, Kate Rozen.

- Two respondents (Dante Pace, Kate Rozen) supported an approach that is an inclusive as possible.
- Two respondents (Gannon Long (Operation Fuel), Jim Head) mentioned favoring a mechanism similar to what exists for CHEAPR or other EV income eligibility requirements. One respondent (Gannon Long (Operation Fuel)) also supported an uncomplicated income verification process.

Question 11: Should DEEP seek to protect LMI participants from unfair or abusive finance terms? If so, how should DEEP do this?

Responses to this question were received from: Dante Pace, Gannon Long (Operation Fuel) Kate Rozen, Thomas Regan-Lefebvre (Center for Latino Progress), Tiffany Chang (Brompton Bicycle Ltd.).

- Two respondents (Gannon Long (Operation Fuel) Kate Rozen) supported coordination with the Department of Consumer Protection.
- One respondent (Dante Pace) supported a broad protection structure inclusive of all participants and not limiting protections to LMI participants.
- One respondent (Thomas Regan-Lefebvre (Center for Latino Progress)) suggested the use of a contract/charter that prohibits deceptive practices.
- One respondent (Tiffany Chang (Brompton Bicycle Ltd.)) shared alternative models that Brompton Bicycle offers (i.e. lease, subscription, inclusive servicing and repair packages).

Question 12: If DEEP utilizes a voucher program, what length of time should be selected for the voucher expiration date?

Responses to this question were received from: Dante Pace, Gannon Long (Operation Fuel) Kate Rozen, Thomas Regan-Lefebvre (Center for Latino Progress).

- Four respondents (Dante Pace, Gannon Long (Operation Fuel) Kate Rozen, Thomas Regan-Lefebvre (Center for Latino Progress)) offered that a period of six (6) to twelve (12) months for voucher expiration would be sufficient. Additionally, two respondent (Dante Pace ,Thomas Regan-Lefebvre (Center for Latino Progress)) recommended a reapplication process for unused vouchers.
- One respondent (Dante Pace) also suggested a seasonal (fall/winter, spring/summer) voucher expiration period.

Question 13: How should vouchers be authenticated?

Responses to this question were received from: Dante Pace, Gannon Long (Operation Fuel) Kate Rozen, Thomas Regan-Lefebvre (Center for Latino Progress), Tiffany Chang (Brompton Bicycle Ltd.).

- Respondents offered numerous pathways for voucher authentication including:
 - o a voucher database.
 - o point of sale physical vouchers,
 - o online voucher codes,
 - o e-bike inventory/service vouchers,
 - o non-authentication due to admin costs and lack of fraud,
 - o OR codes.
 - o through company workplaces, public sector, retailers, etc.

Question 14: What other data/information would inform the development of an E-bike incentive program?

Responses to this question were received from: Dante Pace, David Gutelius, Ethan Heywood, Jim Head, Kate Rozen, Kerri Provost, Michael Romero, Paul Wessel (GNHCCC), Tiffany Chang (Brompton Bicycle Ltd.).

- One respondent (Dante Pace) offered responses that generally touched on determining the universe of bike, e-bike, and public transportation users. Additionally, (Dante Pace) this response mentioned infrastructure considerations (i.e. car-centric development, minimum parking requirements, up-zoning of residential/commercial areas).
- One respondent (David Gutelius) discussed offering a pathway for an automatic "opt-in" registry process for bikes/e-bikes into bike theft registries. The following registries were offered as examples: 1)https://bikeindex.org/ 2)https://project529.com/garage.
- One respondent (Ethan Heywood) commented that, based on experience with CHEAPR, a more user friendly application and voucher receipt process with a step-by-step walkthrough would be beneficial and add transparency. Additionally, providing a resource to verify reputable e-bike retailers.

- One respondent (Jim Head) encouraged the inclusion of e-cargo bikes (rentals, rent to own options) in conjunction with making bike storage facilities available. Also, e-bike maintenance programs (i.e. Velofix, AAA) should be considered.
- Two respondents (Kate Rozen, Kerri Provost) emphasized that communication and feedback with individuals, customers, EJ communities, and retailers should be clear, concise and proactive to encourage program participation.
- One respondent (Michael Romero) mentioned that e-bike conversions should be considered since many people have existing bikes that have the potential to be converted. A number of programs throughout the country offer similar incentives for conversions including Colorado, Vermont, and California (https://www.qualisports.us/blogs/news/ebike-rebates-and-incentives-programsin-the-usa). Additionally, he is a proponent of UL 2849 certified E-bikes as they a required to meet a more strict fire safety standard.
- One respondent (Paul Wessel (GNHCCC)) emphasized a focus on equity by making benefits either directed 100% towards low income or utilized a sliding scale for the incentive by income.
- One respondent (Tiffany Chang (Brompton Bicycle Ltd.)) offered that Brompton Bicycle is a participant of the UK Cycle to Work Scheme (i.e., program), a government initiative which offers a tax-free benefit as the most cost-effective way to purchase a bike. Although this was not applied to e-bikes at the time, regular bikes were incentivized for purchase by employees. Employees do not have to pay tax or national insurance on their bike purchase, which creates a discount, and this deducted from their paycheck over a 12 18 month period.

Additional Questions and Responses Related to E-Bike RFI

- One respondent (Dante Pace) questioned whether a focus on economic rather than environmental justice obscures the real goal of programs similar to the E-bike program which is to get more people out of cars.
- One respondent (Jan Tanner (Benidorm Bikes)) noted that in their capacity as a bicycle
 retailer they observe that e-bikes have been purchased for recreational as opposed to
 transportation use by customers. Additionally, customers have not indicated a need for an
 incentive and perhaps a focus on improving infrastructure to encourage more e-bike use for
 that purpose.
- One respondent (Jay Gherlone) shared their experience that the likely location of e-bike users
 in areas that are unfriendly to bicyclists without designated bike lanes should be of concern.
 Though supportive of the e-bike program, efforts should be made to coordinate with DOT
 and local Police to increase automobile driver awareness of bicycles as well as e-bike owner
 safety awareness.
- One respondent (Paul Wessel (GNHCCC)) provided a number of resources for DEEP to consider from K Shankari, Chris Cherry, Dillon Fitch, and Josh Sperling.
- Five respondents inquired about the current availability of e-bike rebates in response to the RFI.