



NOTICE OF REQUEST FOR WRITTEN COMMENTS

January 22, 2021

The Department of Energy and Environmental Protection (DEEP) is inviting public comment on certain aspects the third round of funding under the Volkswagen (VW) Diesel Emission Mitigation Program (Vehicle Program) and on the first round of funding under the VW Electric Vehicle Supply Equipment (EVSE) Program (EVSE Program) as further described below.

In late 2015, VW publicly admitted it had secretly and deliberately installed a defeat device - software designed to cheat emissions tests and deceive federal and state regulators - in nearly 590,000 VW, Audi and Porsche model year 2009 to 2016 diesel vehicles sold to American consumers. As a result of a federal civil enforcement case against VW for violating the Clean Air Act, Connecticut was allocated over \$55 million, to be distributed over a ten-year period, for use towards offsetting the excess oxide of nitrogen (NOx) pollution emitted in Connecticut by these vehicles.

To date, DEEP has offered two rounds of funding under the Vehicle Program, totaling \$18.3 million in awards, which has financed projects that replaced an array of aging diesel vehicles with cleaner alternatives. DEEP is currently preparing to offer a third round of funding under this program and its initial round of funding under the EVSE Program. More information on the program can be found on DEEP's [VW Settlement Information page](#).

Items for Public Comment

In preparation for the upcoming solicitations on the Vehicle Program and the EVSE Program, DEEP is releasing draft Requests for Proposals (RFPs) and Application Forms and is seeking comments on several questions as well as any other issues related to the draft RFPs and Application Forms before issuing final RFPs:

1. Vehicle Eligibility Under Round 3 of VW

Following the finalization of the VW settlement and the establishment of the [Environmental Mitigation Trust Agreement for State Beneficiaries](#) (Trust), Connecticut was required to develop a plan outlining what projects would be eligible under the States VW funding program and at what funding levels. The [State of Connecticut Beneficiary Mitigation Plan](#) (the Plan), finalized in 2018 and developed with public stakeholder input, mirrored the eligibility options allowed under the Trust. With the growing need to accelerate transition of the state's transportation sector to cleaner options, the electrification of medium and heavy-duty vehicles has been identified as a critical measure for the state to achieve its greenhouse gas (GHG) reduction and air quality goals. DEEP is seeking to maximize the number of electrification proposals the program receives under the final grant solicitations, and is considering making funding available for all project



types allowed under the Plan, including diesel and other alternative fuel replacements, with the clear understanding that the selection criteria will continue to dictate that all electric projects submitted will be given first consideration ahead of any other project types submitted for funding. Are there elements that should be included in the program solicitation that could result in a larger number of proposed electrification projects.

REQUEST: DEEP is seeking input on if the third round of the Vehicle Program should favor, or set aside certain quantity of funds for, eligible projects for replacement or repowering with electric vehicle, equipment or engines?

2. Funding Levels for Round 3 of the Vehicle Program

DEEP is proposing to make up to \$10 million available for funding for VW Round 3 projects. DEEP has conducted outreach efforts throughout 2020 and the feedback received suggests that there will be an increased number of electrification projects seeking funding. Given that electrification projects are typically more costly than diesel projects, it is anticipated that the cost to fund Round 3 projects will be higher than previous rounds.

REQUEST: DEEP is seeking public input on whether or not the overall level of funding proposed for Round 3 of the Program, \$10 million, should remain as proposed, be increased or lowered?

3. Funding for Round 1 of the VW EVSE Program

A robust and effective supply of charging infrastructure is necessary to support the deployment of electric vehicles in Connecticut and as stated in the Connecticut EV Roadmap, private investment in EVSE deployment has not scaled at the pace necessary to meet Connecticut's deployment targets for light duty electric vehicles. As such, some public funding is necessary to build out the state's Level 2 and DCFC network to support current and future EVSE demand in support of Connecticut's multi-state electric vehicle deployment commitment and greenhouse gas (GHG) emission reduction targets. DEEP has committed the maximum allowed under the Trust in the [State of Connecticut Beneficiary Mitigation Plan](#), \$8.4 million of its VW allocation, to fund EVSE projects. DEEP is proposing to offer multiple rounds of EVSE funding over time to allow for the integration of lessons learned in subsequent rounds and adjustment to improvements in technology. In this initial round of the EVSE Program, DEEP proposes to make up to \$ 4 million available for level 2 charging stations at state agencies, public destinations, multi-unit dwellings and workplaces; fast chargers along travel corridors; and a centrally located hydrogen refueling station. DEEP further proposes that the \$4 million in funding be allocated as follows:

- \$1.2 million over 3 years (federal fiscal years 2021-2023) for EVSE infrastructure at state agencies. This funding will also leverage funding under the Congestion Mitigation for Air



Quality funding program (CMAQ) to create a total funding pool of funding to support the transition of the state fleet and expand workplace and public charging at state agencies.

- \$2.3 million for electric vehicle charging infrastructure;
 - \$2 million allocated to building out the fast charging network and
 - \$300,000 for level 2 charging
- \$500,000 for a hydrogen refueling station to be combined with other existing funds earmarked for hydrogen infrastructure development

REQUEST: DEEP is seeking your input on the following two questions:

- ***Is the proposed level of EVSE funding adequate to make meaningful progress to support the EVSE needs for EV deployment under the Multistate Zero Emission Vehicle Memorandum of Understanding?***
- ***Are the funding amounts specified for each allocation (level 2, DCFC, hydrogen refueling) adequate, taking into account the cost of each installation type?***

NOTE: The \$8.4 million committed for the EVSE Program is separate and apart from funds available for EVSE included with an electric replacement or repower project under the Vehicle Program.

4. Structure of the EVSE Program

DEEP is requesting input on the format of the initial round of the EVSE Program as outlined below:

DEEP is considering the implementation of a program design that favors a public-private partnership between the state and charging network provider(s) aimed at leveraging public dollars to maximize the build out of a public EV charging network while at the same time engaging the expertise of the providers who are best able to analyze and amplify the expansion of the state's charging network.

REQUEST: Please provide feedback on whether or not this approach should be limited to the fast charging portion of the program or should this be the approach that governs all of the EVSE Program: level 2, fast charging and hydrogen refueling?

- DEEP intends to include the following selection criteria in the RFP:
 - Ensuring maximum consistency of proposals with the policies and goals outlined in Connecticut's EV Roadmap, which will include, but not limited to:
 - **Future proofing/interoperability** to ensure selected sites can accommodate growth and potential technology shifts (e.g., standardization of charging connectors), and



- **Ensuring a positive consumer experience** by ensuring maximum feasible uptime, providing pricing transparency, accepting multiple forms of payment pursuant to Conn. Gen. Stat. section 16-19ggg requirements and taking proactive steps to prevent internal combustion vehicles from parking in EV only parking spaces;
 - Cost effectiveness of proposed projects;
 - Maximization of air pollutant emissions reductions, including NOx, GHGs, and PM2.5, from projects in Connecticut and particularly in environmental justice communities;
 - Demonstrated experience administering similar projects as those being solicited;
 - Cost share and ability to leverage other funding, including any funding potentially allocated under PURA Docket No. 17-12-03REO4;
 - Promoting economic recovery from the COVID-19 pandemic; and
 - Inclusion of innovative configurations or concepts for purposes of testing or demonstrating novel use cases for EVSE deployment and grid integration (e.g., vehicle-to-grid services, or electric school bus deployment).

5. Other suggestions or comments on the draft RFPs and/or Applications are welcomed.

Please provide any other comments or suggestions, including but not limited to, identifying other successful models that may be transferable to Connecticut including platforms that enable charging-as-a-service and that may include operation and maintenance services.

Comment Period

DEEP will accept public comment on these parameters by Tuesday, February 16, 2021 at 5:00 PM. Comments should be emailed to DEEP.mobilesources@ct.gov with the subject ***“Response to VW Request for Comments”***.