



June 19, 2021

Taxi and Limousine Commission
33 Beaver Street
22nd Floor
New York, NY 10004

**Re: Amendment of Rules Governing Issuance of For-Hire Vehicle Licenses
(Reference Number: 2021 RG 031)**

Chair Heredia Jarmoszuk and Commissioners:

Thank you for the opportunity to comment on the proposed amendment of rules governing issuance of for-hire vehicle (FHV) licenses by the Taxi & Limousine Commission (TLC). CALSTART opposes the proposed amendment to remove the electric vehicle (EV) exemption for FHV license issuance. While we agree that roadway congestion is a paramount policy issue for New Yorkers' air quality and standard of living, we urge the TLC to address this imperative through other means than by foreclosing opportunities for the EV ecosystem to develop. The persistently low EV adoption rate in New York City is a problem that demands more—not less—policy support and directed investment at this critical inflection point.

CALSTART is an internationally recognized nonprofit clean transportation technology consortium, with more than 280 members all dedicated to the growth of the clean transportation industry. CALSTART works with the public and private sectors to drive innovation in clean vehicles and mobility. Our membership includes vehicle manufacturers, suppliers, infrastructure providers, fleets, low-carbon fuel producers, utilities, investors, and more. CALSTART has seven offices across the country, including our Northeast Regional Office in Brooklyn, NY.

CALSTART ran a NYSERDA-sponsored workplace charging incentive campaign¹ from 2017-2020 in recognition of the structural impediments to EV adoption in and around New York City—namely the heavy reliance on either on-street parking or shared garages that are not configured to support dedicated chargers. Despite the installation of 130 plugs in lower New York through this program, the same structural issues persist and more high-throughput infrastructure support is urgently needed.

We applaud the TLC for its efforts in recent years to advance two major policy priorities for New York City, reining in roadway congestion by freezing FHV license issuance while encouraging a shift in the FHV fleet toward electric vehicles (EVs) by exempting EVs from this freeze. While this exemption has not been widely utilized—currently less than 0.5% of FHV on New York City roads are electric—the need to transition more of the on-road fleet to EVs grows more pressing by the day. And recognizing that FHVs drive more miles than do typical passenger vehicles, focusing efforts on incenting and supporting FHV electrification will

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¹ <https://chargetoworkny.com/>

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deliver the greatest benefits to New Yorkers by maximizing electric miles as well as avoided emissions from on-road cars.

Despite Mayor de Blasio's announcement in September 2017 that the City would build fast charging hubs in each borough to catalyze uptake of EVs citywide, the City has moved slowly to put in place the infrastructure necessary to support meaningful adoption of EVs. Nearly four years after that announcement, the City has yet to open any of the proposed fast charging sites in DOT-operated lots and garages. Moreover, the private sector has not adequately filled the gap on its own; there are currently only nine fast charging sites throughout the five boroughs, including three that are part of a DCAS pilot and one site built by the New York Power Authority (NYPA), and several of the nine feature only one or two plugs.²

The all-EV rideshare service recently announced by Revel provides precisely the sort of investment the City has been lacking, providing a credible pathway to make the benefits of electric vehicles more accessible to drivers and FHV customers alike. Revel's first Superhub in Brooklyn will be the largest fast charging installation in New York City and can scale to be even larger, accommodating not just Revel ride-hail vehicles but also private cars and potentially freight uses. Alongside the NYPA fast charging site at JFK Airport intended for FHV drivers, these well-situated and large-scale fast charging sites can make FHV electrification not just viable, but more economic than using conventional cars in FHV service. With convenient locations, reliable access to a plug, and a quick charging experience, FHV drivers could begin to transition their millions of miles each year in NYC from polluting gasoline to clean electricity.

We urge the TLC to reject this proposed rule and to retain the EV exemption indefinitely. Doing so will send the strong signal to the private market that New York City is open for EV investment and innovation. We do understand and support the City's emphasis on congestion mitigation, but submit that this burden should fall not on low-impact, high-performance EVs but rather on non-electric FHV service.

Thank you for the opportunity to comment on this important matter.

Sincerely,

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² <https://www.plugshare.com/>; filtered to stations with ≥ 50 kW capacity and non-restricted sites.