



June 18, 2021

Taxi and Limousine Commission
33 Beaver Street
New York, NY 11201

Re: Comments to the TLC's Proposal to Amend Rules Related to Battery Electric Vehicles

Dear Commissioners:

Consolidated Edison Company of New York, Inc. (Con Edison) submits these comments to the Taxi and Limousine Commission's (TLC) proposal to amend its rules relating to the issuance of for-hire vehicle (FHV) licenses to battery electric vehicles. As part of our Clean Energy Commitment, Con Edison is committed to leading and delivering the transition to the clean energy future in support of the ambitious climate goals of New York City and New York State. In support of these carbon reduction goals we have developed the country's second largest electric vehicle (EV) charging infrastructure program to reduce infrastructure costs of EV chargers and have also partnered with the New York City Department of Transportation to develop and pilot curbside EV chargers across all five boroughs.

Large scale adoption of EVs is essential for New York City to achieve its climate goals, reiterated in a recent study published by the City of New York and its utility partners¹. A clean transportation system also brings additional benefits including improved health outcomes from reduction of localized air pollution and noise levels. Access to clean and efficient transportation, which can include transit, EVs, and improved biking and pedestrian infrastructure, will be key to realizing such benefits.

Range anxiety due to insufficient access to EV charging has been widely recognized as a leading barrier to EV adoption, and it is a particularly acute challenge in our dense urban environment. The development of easily accessible, geographically diverse, and visible charging infrastructure across the city will be critical to driving EV adoption. In order for such charging infrastructure buildout to be economically viable, costs need to be spread over a minimum predictable baseline usage of the chargers. This baseline use of chargers is possible when they serve EVs who have consistent and significant charging needs on an ongoing basis, such as taxis and FHVs. And in a virtuous loop, an increase in the number of chargers supported by such higher use vehicles that are also open to the public can enhance confidence among the public, a majority of which are renters without access to in-home charging, to adopt EVs and thus facilitate a faster transition needed to meet our climate goals.

Con Edison kindly requests that the TLC reconsider the potential impacts of this rule change from an environmental perspective. Meeting the goals of a low carbon future entails using all the policy tools and levers available to facilitate an electrified transportation system. We stand ready to assist the TLC

¹ <https://www1.nyc.gov/assets/sustainability/downloads/pdf/publications/Carbon-Neutral-NYC.pdf>



and the City as it continues to transition internal combustion engine vehicles to EVs to reach our climate goals.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Raghu'.

Raghu Sudhakara
Director, Demonstration Projects