



February 2, 2018

Carolyn Watkins (derg@epa.ohio.gov)  
Ohio EPA- OEE  
P.O. Box 1049  
Columbus, OH 43216-1049

RE: Ohio EPA's Draft Beneficiary Mitigation Plan, *In re: Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation, MDL No. 2672 CRB (JSC) (December 7, 2017)*

Dear Ms. Watkins,

In response to the above-referenced docket, American Municipal Power, Inc. (AMP) and the Ohio Municipal Electric Association (OMEA) hereby provide the following comments for the record. While supportive of Ohio EPA's Draft Beneficiary Mitigation Plan, additional adjustments to the counties eligible for funds and a refocus from fast charging along freeways to Level 2 charging in publicly available locations would provide a more significant impact to the health and welfare of Ohioans.

#### Background on AMP and OMEA

American Municipal Power, Inc. (AMP) is a non-profit wholesale power supplier and service provider for 135 members, including 134 member municipal electric systems in the states of Ohio (84), Pennsylvania (29), Michigan (6), Virginia (5), Kentucky (6), West Virginia (2), Indiana (1), Maryland (1) and the Delaware Municipal Electric Corporation, a joint action agency with nine members headquartered in Smyrna, Delaware. Combined, these member utilities serve more than 650,000 customers. AMP's core mission is to be public power's leader in wholesale energy supply and value-added member services. It offers member municipal electric systems the benefits of scale and expertise in providing and managing energy services.

AMP's diverse energy portfolio makes the organization a progressive leader in deploying renewable and advanced power assets that include a variety of baseload, intermediate and distributed peaking generation using hydropower, wind, landfill gas, solar and fossil fuels, as well as a robust energy efficiency program. While power supply remains its primary mission, AMP also offers a wide variety of other services including, but not limited to, safety programs, technical services, financial assistance, legislative coordination, green power pricing, energy efficiency, regulatory and compliance assistance.

**DELAWARE** DELAWARE MUNICIPAL ELECTRIC CORPORATION **INDIANA** CANNELTON **KENTUCKY** BENHAM • BERA • PADUCAH • PARIS • PRINCETON • WILLIAMSTOWN  
**MARYLAND** BERLIN **MICHIGAN** CLINTON • COLDWATER • HILLSDALE • MARSHALL • UNION CITY • WYANDOTTE **OHIO** AMHERST • ARCADIA • ARCANUM • BEACH CITY • BLANCHESTER  
BLOOMDALE • BOWLING GREEN • BRADNER • BREWSTER • BRYAN • CAREY • CELINA • CLEVELAND • CLYDE • COLUMBIANA • COLUMBUS • CUSTAR • CUYAHOGA FALLS • CYGNET • DELTA • DESHLER  
DOVER • EDGERTON • EL DorADO • ELMORE • GALION • GENOA • GEORGETOWN • GLOUSTER • GRAFTON • GREENWICH • HAMILTON • HASKINS • HOLIDAY CITY • HUBBARD • HUDSON • HURON  
JACKSON • JACKSON CENTER • LAKEVIEW • LEBANON • LODI • LUCAS • MARSHALLVILLE • MENDON • MILAN • MINSTER • MONROEVILLE • MONTPELIER • NAPOLEON • NEW BREMEN  
NEW  
KNOXVILLE • NEWTON FALLS • NILES • OAK HARBOR • OBERLIN • OHIO CITY • ORRVILLE • PAINESVILLE • PEMBERVILLE • PIONEER • PIQUA • PLYMOUTH • PROSPECT • REPUBLIC • SEVILLE SHELBY •  
SHILOH • SOUTH VIENNA • ST. CLAIRSVILLE • ST. MARYS • SYCAMORE • TIPP CITY • TOLEDO • VERSAILLES • WADSWORTH • WAPAKONETA • WAYNESFIELD • WELLINGTON • WESTERVILLE WHARTON •  
WOODSFIELD • WOODVILLE • YELLOW SPRINGS **PENNSYLVANIA** BERLIN • BLAKELY • CATAWISSA • DUNCANNON • EAST CONEMAUGH • ELLWOOD CITY • EPHRATA • GIRARD GOLDSBORO •  
GROVE CITY • HATFIELD • HOOVERVILLE • RUTZTOWN • LANSDALE • LEHIGHTON • LEWISBERRY • MIFFLINBURG • NEW WILMINGTON • PERKASIE • QUAKERTOWN • ROYALTON SAINT CLAIR •  
SCHUYLKILL HAVEN • SMETHPORT • SUMMERHILL • WAMPUM • WATSONTOWN • WEATHERLY • ZELIENOPLE **VIRGINIA** BEDFORD • DANVILLE • FRONT ROYAL • MARTINSVILLE • RICHLANDS  
**WEST VIRGINIA** NEW MARTINSVILLE • PHILIPPI

The OMEA was formed in 1962 and represents the state and federal legislative interests of AMP and 84 Ohio municipal electric systems. The OMEA is closely aligned with AMP and shares AMP's concerns, comments and recommendations herein.

## **BENEFITS OF PUBLIC POWER**

Public power utilities are not-for-profit entities owned by their communities and run as a division of local government. They are governed by a local city council or an elected or appointed board. As a result, public power is an integral part of local communities and they provide a direct link between customers and their power supply. The goal of public power is to provide safe, reliable electricity to customers at low rates.

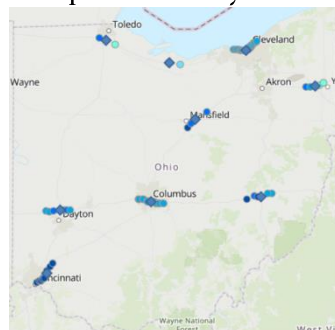
## **COMMENTS ON OHIO EPA'S DRAFT BENEFICIARY MITIGATION PLAN**

The Draft Beneficiary Mitigation Plan demonstrates that Ohio EPA has conducted a deliberative and measured approach to appropriating funds in order to meet the fully executed *Environmental Mitigation Trust Agreement for State Beneficiaries* (Trust Agreement) and maximize available funds. AMP's comments outline recommendations to further assist Ohio EPA in meeting and exceeding the goals outlined in the Draft Plan by maximizing air emissions reductions and mitigating the negative air quality impacts already experienced.

AMP and OMEA commend Ohio EPA's decision to use the maximum allocation of 15% towards Zero Emission Vehicle (ZEV) supply equipment (\$11,295,378). Under this allocation, the Plan states that "Priority will be accorded to installation of DC fast charging stations in areas where Phase 3 electric service is already available, and filling in gaps along Ohio's major highway corridors where transportation legislation under the FAST ACT is establishing a national network of alternative fueling and charging infrastructure." In addition to the maximum allocation towards ZEVs, the Ohio EPA provided that "Ohio may also fund some Level 2 stations at locations where demand makes these more appropriate."

AMP and OMEA encourage Ohio EPA to redirect the focus from fast charging along highway transportation corridors to Level 2 charging in publicly available locations. The U.S. DOE conducted a [study](#) in 2016 which showed that DC fast charger installations were by far the most expensive ranging from \$8,500 to \$50,000 per installation. The cost for public level 2 charger installations ranged from about \$600 to \$12,660. By focusing on Level 2 charging infrastructure, countless additional chargers could be deployed in highly frequented public locations.

As recognized by Ohio EPA, other groups are already focusing on primary freeway corridors including Electrify America and the [Electric Vehicle Charging Association in partnership with AEP Ohio](#). According to the [Electrify America plan](#), they will be installing between four and ten DC fast chargers at each highway site, on average 70 miles apart. Electrify America has informed us they are evaluating sites in Ohio along interstates 80/90, 71 and 70. These areas significantly overlap Ohio EPA's first and second priority areas. See below map of Electrify America's proposed target zones within Ohio.



Electric vehicles are broadly recognized as day-to-day commuter vehicles. Charging stations in pedestrian friendly public locations would increase familiarity with the technology and demonstrate that charging is easily accessible in local communities. According to the US Census, 72% of drivers live in their principal city metro area. According to the [Electric Vehicle Readiness Plan for Ohio](#), over 70% of drivers in Cleveland and Columbus commute less than 20 miles round trip each day, and over 80% of drivers commute less than 50 miles. This implies that the likelihood of their needing a fast charging station on a daily basis is minimal. The study also found that by 2030, the Cleveland and Columbus metro-service areas combined will need over 50,000 non-residential charging stations installed at workplaces and destinations.

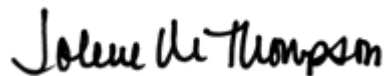
Ohio EPA's stated goal to "expedite deployment and widespread adoption of zero-emission and near zero emission vehicles..." should be a key factor in fund distribution. In order to maximize the funds available, AMP and OMEA recommend funding for the installation of Level 2 charging stations (not DC fast) in public locations, for public use, within local communities. AMP/OMEA communities are uniquely positioned to take advantage of Level 2 charging and many AMP/OMEA communities have expressed interest in Level 2 charging infrastructure in publicly accessible areas of their communities. By working directly with these municipal electric utilities, installation of public charging stations would be streamlined resulting in direct benefits to Ohioans.

The map created by Ohio EPA on page 9 of the Plan identifies first and second priority counties that are eligible for funds. While the map largely represents counties with historical air quality challenges, AMP and OMEA recommend that Ohio EPA expand eligibility of mitigation funds to additional Ohio counties, particularly those with historical air quality issues and those located upwind of priority areas. Specifically, Belmont, Clark, Clinton, Miami, Preble and Wood counties all have experienced attainment challenges in the past and should be added as second priority areas. In addition, Williams, Henry, Fulton, Huron, Wayne, and Dover should be considered due to their geographic location as upwind from non-attainment and/or priority counties. Reductions in NOx and particulate emissions in these upwind counties would have a direct impact on air quality in downwind counties.

## **CONCLUSION**

We thank Ohio EPA for the opportunity to provide these comments on behalf of AMP and OMEA. If you need additional information, please don't hesitate to contact us.

Respectfully submitted,



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