
From: James Orenstein
Sent: Monday, October 8, 2018 4:46 PM
To: VWSettle
Subject: Volkswagen Draft Beneficiary Mitigation Plan for Texas: Public Comments James Orenstein

I would like to endorse the comments from the Texas Electric Transportation Resources Alliance (see reference below), as I testified at the Arlington hearing Sep. 14, 2018.

In particular I support:

- 1) Putting EV chargers about every 50miles on interstate highways,
- 2) Reallocation of funds to ensure that DFW gets its fair share, and
- 3) Setting aside 25 of the money to low and moderate income, multi-family projects.

My personal comment is that supporting LMI multi-family projects is extremely important in addressing the public policy equity issue, as well as an efficient way to encourage replacement of older, more polluting vehicles.

As used EVs are becoming ,more affordable, access to charging is becoming a more significant barrier to ownership by LMI families.

My background is as a volunteer EV advocate in the DFW area, having worked with (but not representing in any official capacity) the North Texas Electric Auto Association, the North Texas Tesla Owners Group, and the DFW Clean Cities/North Central Texas Council of Governments Electric Vehicles North Texas projects.

Reference from <https://txetra.org/vw-hearings> :

TxEtra Charging Station Recommendations:

1. Frequency:

- a. About every 50 miles by 2020 to support Intercity travel of Longer Range BEVs along the major highways connecting the Texas Triangle (DFW, Houston, San Antonio, Austin)
- b. Urban-suburban areas based on density of EV ownership, plus support for low/medium income charging station placement.

2. Location

- a. Where power line capacity is adequate.
- b. Beyond where other charging networks (like Electrify America) will already be building.
- c. Locations, accessible and attractive to a wide variety of consumers, such as big gasoline retailers, restaurants, and big-box grocery and retail stores

3. Accessible to All.

- a. Assure that the charging stations can use all providers – ChargePoint, Charge America, EVgo, Greenlots, Blink, Tesla, etc. and all REPs.
- b. Accessible to all apps. Electric Vehicle drivers utilize apps to find charging stations and map out routes if they are traveling long distances. Charging station locations and availability should be identified on apps and available to all Electric Vehicle (EV) drivers.

4 Smart charging stations should be interconnected and interoperable so that they can transmit and receive data to and from utilities, charging station owners, grid operators, vehicle owners, and apps.

5. Assure equity.

- 22% of Texans are poor.

- EVs can lower the cost of transportation.

- A whopping 40.2% of a low-income's family's income goes to transportation - contrasted to 13% for average families.

- Studies have shown that maintenance and fuel for an EV is about 1/3 the cost of owning a conventional gasoline-powered vehicle.

- EVs are starting to enter the used car market, A recent Consumer Reports study found that it is currently significantly cheaper to buy a used EV than a similar quality gasoline-fueled car.

- TxETRA recommends 25% of the VW Settlement Charging Funds be set aside for multi-family and public facilities in low-income communities.

Thanks for your consideration,

James Orenstein

Oct. 8, 2018