September 28, 2018

Indiana Volkswagen Mitigation Trust
Indiana Department of Environmental Management
Indiana Government Center North
100 North Senate Avenue
Indianapolis, IN 46204
Email: VWTrust@idem.IN.gov

RE: Comments of the Environmental Law & Policy Center, Improving Kids' Environment and Hoosier Environmental Council Regarding the Indiana Beneficiary Mitigation Plan for the Volkswagen Environmental Mitigation Trust

Dear Commissioner Pigett and members of Indiana's Volkswagen Environmental Mitigation Trust Fund Committee,

Thank you for this opportunity to give input on Indiana Department of Environmental Management's Draft Beneficiary Mitigation Plan. We appreciate that IDEM both solicited public input in advance of and after drafting its plan.

We specifically applaud the ~$2.85 million carve out for electric school bus projects and commend the allocation of the maximum 15% (~$6.15 million) for light-duty electric infrastructure equipment in the Draft Plan.

Electric School Bus:

Electric buses are a priority for numerous stakeholders including schools, public health officials and Duke Energy Indiana, which in its earlier comments notably offered to cover more than a third of electric school bus projects through a pilot program that explores the opportunity for advanced vehicle-to-grid (V2G) integration of electric buses.[1]

Indeed in recent conversations with both electric utilities and RTO's, we have found significant interest in V2G projects and the potential for electric school buses to serve numerous purposes: transporting children during the school year, serving as battery storage in electricity peak demand periods (especially summer when many fewer school buses are in use by schools), thus sharing the costs and benefits with potential new revenues for both schools and utilities.

IDEM's planned electric school bus carve out complements the Ohio and Illinois carve outs of $3 million and $10.9 million respectively in their states' BMPs. By collaborating regionally Midwestern schools and those serving them can seek group buy discounts and speed the improvements of children's health across the region.

The carve out will drive market transformation. With all major domestic school bus manufacturers having and developing electric models and the recent availability of Volkswagen Mitigation Funding, now is the time for state leadership to help drive costs down. The experience curve shows that costs typically decline

[1] Duke Energy Indiana, Volkswagen Settlement Mitigation Trust Fund Comments, March 2018

by 20-30% when production is doubled.[2] Blue Bird, the largest domestic school bus manufacturer, predicts that costs for its electric model could decline by 40% with quantity, driving the purchase price towards cost-parity.[3] This aligns with the decline in costs in electric transit buses since 2010 when that technology was in a similarly nascent phase.[4] This would make the total cost of ownership of an electric school bus the lowest given the annual operational savings of approximately $10,000 per bus.[5] As the purchase price of electric school buses reach cost-parity, the operational savings attributable with the technology can result in more resources being allocated towards essential classroom activities.

We encourage IDEM to maintain or increase the electric school bus carve out. In addition, we ask that the state give preference to zero emission electric projects for the additional funding in the on road equipment and vehicles group rather than not preferring them as indicated by the stated intention to require a higher cost share for them. It is inconsistent and troubling that IDEM intends not to fund heavy duty electric infrastructure costs for onroad (and nonroad) equipment and vehicles; Illinois' plan indicates it will fund these when needed by projects.

Electric Vehicle Infrastructure:

Emissions from the transportation sector now exceed those from the power sector, making it essential that we move towards an electric vehicle future, fueled by renewables. Electric vehicle infrastructure is essential for this goal. For this reason we fully support the 15% carveout for EV infrastructure.

Match Requirement:
In general we feel that public/government entities should be required to have a lower match than non-governmental applicants. IDEM could take a similar approach to North Carolina in this regard, considering partnership applications as public.

The only situation in which we think it is appropriate for governmental and non-governmental to have equivalent match requirements is electric school buses. Children in districts that must lease/use a contractor to provide the bus or drive (often the less well-off school districts which can't afford to own their own buses) should not be penalized (have less chance of a new clean bus) due to the ownership of the bus.

One aspect of the match that does not seem to fit with Mission Statement and Overall Goals is IDEM "intends to use VW Trust funds to reimburse both non-government and government owned fleet and equipment owners at a lower level (require 5% more cost-share from applicant) for electric-powered equipment and vehicles." This is at odds with the prioritization of "projects that are transformative", the "focus on technological change and advancement", and the "appropriate considerations to projects that have diesel emission reductions that go beyond just NOx, including PM2.5, hydrocarbons (HC), carbon monoxide (CO) and carbon dioxide (CO2)." This discrepancy is further aggravated by the above noted intention to not fund heavy duty electric infrastructure costs which can be non-trivial.

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[2] http://www.economist.com/node/14298944
[3] http://www.schoolbusfleet.com/article/722681/golden-opportunities-to-go-for-green-taking-advantage-of-alt-fuel-school-bus-funding
[4] http://www.govtech.com/fs/transportation/Electric-Buses-Are-Gradually-Replacing-Older-Fossil-Fuel-Models.html
[5] ADOMANI, Inc.'s Comments to Michigan regarding its Volkswagen Funds

Estimates of Potential Emission Reductions: The Draft Plan states on page 5 that "Project outcomes will be quantified with the U.S. EPA's Diesel Emissions Quantifier (DEQ) or other appropriate methodology that will be clarified in the solicitation for projects packet that will come at a later date." It is important that emissions reductions be quantified as accurately as possible and therefore good that IDEM recognizes that tools in addition to (and potentially more accurate than) USEPA's DEQ may become available. As an example, the Argonne National Laboratory released the Heavy-Duty Vehicle Emissions Calculator (https://afleet-web.es.anl.gov/hdv-emissions-calculator/) earlier this year, partly to address concerns that DEQ underestimates emissions of nitrogen oxides from new (post-2010) diesel engines. IDEM should use the most up-to-date tools available for emissions reduction calculation for each round of project applications. In addition, on page 5, the draft BMP states: "Project outcomes will be quantified with the U.S. EPA's Diesel Emissions Quantifier (DEQ) or other appropriate methodology that will be clarified in the solicitation for projects packet that will come at a later date." The projects packet should make clear that all applicants must use the same estimation methodology so that reductions to be achieved can be compared across applications. For post-2010 diesel vehicles with significant idling, low speeds, or low engine loads the method should be **AFLEET 2017 with the diesel in-use multiplier.** Applicants should also be required to provide the inputs they are using to the estimation calculation, as those are critical to the outcome.

Thank you for all your efforts to make this program truly benefit the residents of Indiana harmed by air pollution and for this opportunity to provide input.

Respectfully submitted,

Susan Mudd
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Environmental Law & Policy Center
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Hoosier Environmental Council
3951 N Meridian St, Ste 100
Indianapolis, IN 46208
317-685-8800

Margaret Frericks, PhD
Interim Executive Director
Improving Kids' Environment
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Indianapolis, IN 46202
317-677-4760

SEALS, SHAWN

From: Kevin Vincent <kevin.vincent@workhorse.com>
Sent: Friday, September 28, 2018 5:24 PM
To: IDEM VWTrust
Subject: Comments on the Draft Indiana Beneficiary Mitigation Plan

Workhorse Group Inc. (Workhorse), is a U.S. small business that manufactures electric trucks and vans, including Class 4 through 6 delivery trucks and vans. Our headquarters facility is in Ohio but the factory where we manufacture our trucks is located in Union City, Indiana.

Mitigation projects to replace diesel vehicles with electric vehicles are an excellent use of VW Settlement Beneficiary Mitigation Plan funding. Replacing class 4 through 6 diesel delivery vehicles with electric vehicles is the most effective use of Beneficiary Mitigation Plan funds. The drive cycle for delivery vehicles is ideal for electric vehicles. They make frequent stops usually within a limited range and typically return to a home base each night where they can be charged at less expensive overnight rates. Of course, replacing diesel delivery vehicles with all-electric vehicles will achieve 100% NOx reduction.

Diesel delivery vehicles usually operate in areas with a disproportionate pollution burden. Distribution centers are in locations that now receive a disproportionate share of air pollution burden from diesel fleets. As a result, funding for electric delivery vehicle purchases would be the quickest and most effective way to mitigate the damage to human health and the environment from diesel emissions.

Class 4 through 6 electric delivery vehicles can be acquired now. Workhorse is currently producing all-electric delivery trucks and its new all-electric N-GEN delivery vehicle goes into production later this year. Furthermore, many other manufacturers have announced that they are introducing class 4 through 6 electric trucks within the next few years. By using its Beneficiary Mitigation Plan funds for class 4 through 6 delivery trucks, Indiana's citizens can obtain benefits from this funding in the near-term, rather than far into the future or never at all.

We applaud the State of Indiana for proposing to use its Beneficiary Mitigation Plan funding to support the replacement of diesel trucks with electric trucks. We fully support the allocation of funds that can be used for the acquisition of Class 4 through 8 electric trucks in the draft Indiana Beneficiary Mitigation Plan.

Workhorse is interested in working with companies and government agencies that propose to use Mitigation Plan funding to replace their diesel fleets with electric vehicles.

Thank you for giving us an opportunity to comment on Indiana's draft Beneficiary Mitigation Plan. Please contact me if you have any questions about our comments

--
O. Kevin Vincent

Vice President for Government,
Regulatory & Safety Affairs

Workhorse Group Inc.
703.822.3390 Mobile
www.workhorse.com

SEALS, SHAWN

From: Jennifer Sage <jennifer.sage@aes.com>
Sent: Friday, September 28, 2018 7:00 PM
To: IDEM VWTrust
Subject: IDEM's Draft Framework of the State's Beneficiary Mitigation Plan
Attachments: IDEM response 9-28-18 SIGNED.pdf

Dear Commissioner Pigott and Mr. Seals,

Attached please find comments prepared by AES Next in regards to the request from the Indiana Department of Environmental Management on the State Beneficiary Mitigation Plan for the Volkswagen Mitigation Trust.

We sincerely appreciate the opportunity to comment on the Draft Framework. Should you have any questions regarding our response, please do not hesitate to contact me.

Best regards,
Jennifer

JENNIFER C. SAGE, CRM
Director, Transportation Business Development
The AES Corporation
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✉ Jennifer.sage@aes.com

September 28, 2018

Commissioner Bruno L. Pigott
Shawn Seals, Office of Air Quality
Indiana Department of Environmental Management
Indiana Volkswagen Mitigation Trust
VWTrust@idem.IN.gov

Re: IDEM's Draft Framework of the State's Beneficiary Mitigation Plan Comments of AES Next, LLC

Dear Commissioner Pigott and Mr. Seals:

AES Next submits the following comments in response to IDEM's August 29, 2018, request for comments on its revised "Draft Indiana Beneficiary Mitigation Plan." The State of Indiana has been allocated $41 million from the Volkswagen Environmental Mitigation Trust Fund for the purpose of funding projects that will improve air quality be reducing emissions of Nitrogen Oxides from Mobile sources.

Executive Summary

AES Next proposes that Indiana's overall goal for the Trust Funds should be two-fold: 1) to promote the replacement of diesel vehicles with Electric Vehicles (EV's) and 2) to add renewable electricity as a fuel source for EV's to truly reduce and eliminate tailpipe and air emissions.

Category 1 Replacement of Diesel Vehicles- AES Next proposes that Indiana allocate 80% ($33 million) of its Trust Funds to replace Diesel Vehicles with Electric Vehicles and Natural Gas Vehicles ("NGVs") at the proposed 40%/40% split between EVs and NGVs.

Category 3 New Light Duty Aero Emissions Vehicle Supply Equipment- AES Next supports the allocation 15% ($6 million) of the Trust Funds to create the "Crossroads of America EV Interstate Corridor Project," a statewide network of DC fast chargers along Indiana's major highways.

AES Next, LLC

AES Next is the new growth investment and incubation arm of the AES Corporation charged with growing new business platforms that transform customer experience and the electricity sector as a whole.

The VW Mitigation Trust

The settlement between the U.S. Justice Department and Volkswagen requires VW to pay $2.9 billion into the Environmental Mitigation Trust Fund, to offset the excess air pollution emitted by the VW vehicles that violated the Clean Air Act. Indiana expects to receive $40.9 million from the Trust in, at least, three annual installments starting in 2018, with all funds being fully disbursed by 2028. Pursuant to the terms of the Mitigation Trust, eligible projects to reduce NOx

emissions from diesel-powered vehicles and equipment will include replacement and repowering of existing diesel vehicles or equipment with cleaner alternatives serving the same purpose.

Indiana must develop and submit a Beneficiary Mitigation Plan ("BMP") to the Trustee describing what types of eligible projects will be implemented to achieve reductions in diesel emissions, with a focus on NOx emissions, across Indiana. The BMP must include the state's overall goal for the use of the Trust Funds; which categories of Eligible Mitigation Actions will achieve the State's goals and what percentages; how the State will consider the beneficial impact of the Eligible Mitigation Actions areas; and a general description of the expected ranges of emission benefits the State will realize from implementation of the Eligible Mitigation Actions.

Explanation of AES Next' Proposed Uses for the VW Trust Funds

1. **The Indiana Beneficiary Mitigation plan should provide greater funding for electric vehicles that utilize 100% renewable electricity as a fuel source.**

The Revised Draft BMP should include greater incentives to fund procurement of electric vehicles that include renewable electricity as a fuel source. AES Next suggests Indiana create a two-tiered funding amount for each diesel vehicle replaced with an electric vehicle. In doing so, a greater incentive, through a higher funding tier, should be awarded for electric vehicles that demonstrate 100% of the power will be from renewable energy sources. AES Next recommends a 30% to 50% higher funding amount for electric vehicles bundled with 100% renewable power compared to a base funding tier for all other electric vehicles using traditional utility power or power that contains fossil fuel sources.

The BMP's mission statement and overall goals include, "In promoting the reduction of emissions of nitrogen oxides, the Indiana Volkswagen Environmental Mitigation Trust Fund Program will prioritize sustainable projects that are transformative, positively impacting the environment, enhancing the health and well-being of residents, and promoting Indiana's growing economy." The goals include:

- Improve air quality across Indiana through cost-effective NOx emission reduction strategies
- Maximize diesel emission reductions across Indiana, while considering various categories of sensitive populations as areas of specific focus
- Appropriate considerations to projects that have diesel emission reductions that go beyond just NOx, including PM2.5, hydrocarbons (HC), carbon monoxide (CO), and carbon dioxide (CO2)
- Encourage leveraging of project partner funds with VW Trust funds to further the reach of the Indiana program

Renewable electricity as a fuel source provides renewable energy for all miles driven by the electric vehicles. It targets a net of 100% renewable energy annually by linking the energy consumption for the vehicles with renewable energy from on-site solar and/or wind through renewable contracts, such as power purchase agreements that are purchased directly from

independent off-site wind or solar farms or from a utility. There is a growing market for renewable power purchase agreements with more than 5GW of renewable capacity purchased in 2017 according to Bloomberg New Energy Finance. Without renewable electricity as fuel, electric vehicles that source energy solely from the grid will continue to produce associated emissions.

Adding renewable electricity as a fuel source to power electric vehicles would completely eliminate emissions and thereby maximize NOx and other greenhouse gas emission reductions from diesel vehicles while also improving air quality in areas that have a disproportionate air quality burden.

By using Trust funds to incentivize EVs with renewable electricity as fuel sources, the revised Beneficiary Mitigation Plan would realize 66% greater reduction in greenhouse gas emissions in the state of Indiana according to the U.S. Department of Energy's Alternative Fuels Data Center.[1] Using renewable energy as fuel completely eliminates emissions from both diesel engines and helps bring new renewable energy sources to decarbonize the electricity grid.

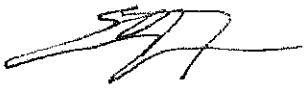
Renewable electricity as fuel infrastructure would maximize financial savings from use of the Trust funds to the residents of the state of Indiana. Additional benefits would include elimination of particulate matter (PM) which drives rising health care costs in those areas of greatest impact with the highest air quality burden.

In addition, prioritizing funding for renewable energy projects will drive job growth in the clean energy sector. According to the Solar Foundation in Washington D.C., the solar industry added 1,133 new jobs in Indiana between 2015 and 2016 and continued to grow in 2017. Renewable energy projects are transformative, provide better air quality to our entire state and improve Indiana's economy by adding jobs to the solar industry.

Thank you for the opportunity to comment upon the State's Beneficiary Mitigation Plan Draft Framework. We would welcome the opportunity to answer any questions you have regarding AES Next' proposed use of the Trust Funds.

Sincerely,

AES Next, LLC



Enrique Ruiz, Vice President

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[1] Alternative Fuels Data Center: Emissions from Hybrid and Plug-In Electric Vehicles

SEALS, SHAWN

From:	Denise Abdul-Rahman <darahman17@gmail.com>
Sent:	Friday, September 28, 2018 8:17 PM
To:	IDEM VWTrust
Subject:	Final Amendment NAACP Indiana Volkswagen Settlement
Attachments:	NAACP Indiana Volkswagen Settlement .pdf

Dear Commissioner Pigott,

Respectfully,

Denise Abdul-Rahman
NAACP Indiana
Environmental&Climate Justice
Equity Consulting

BS, MBA, HCM, HIS

317-331-0815
LinkedIn: http://linkedin.com/in/deniseabdulrahman
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Instagram: Denise_abdulrahman

Serving: NAACP Indiana Environmental &Climate Justice Chair, Climate Justice Alliance, RE-AMP, USCAN Just Social and Economic Co-Chair, Midwest Energy News 40 under 40 Advisory Board &Vice Chair of Indianapolis Air pollution Control Board

Awardee Recipient- EarthCharter Indiana, "Social and Economic Justice", Sister Soldier Network "Outstanding Citizen Community Service" and Hoosier Environmental Council "Environmentalist of the Year" CREDO "Climate Hero"

Sent from my iPhone

NAACP

Indiana State Conference

Final Amendment
September 28, 2018

Indiana Volkswagen Mitigation Trust
Indiana Department of Environmental Management
Indiana Government Center North
100 North Senate Avenue
Indianapolis, IN 46204
Email: VWTrust@idem.IN.gov

RE: Comments of the Indiana State Conference of the NAACP input from our members across the State Regarding Equity in the Indiana Beneficiary Mitigation Plan for the Volkswagen Environmental Mitigation Trust

Reference: Indiana Volkswagen Settlement

Dear Commissioner Pigott:

On behalf of the Indiana State Conference of the NAACP, our Members and the Communities we serve.

We write to request that the Indiana Department of Environmental Management and its Volkswagen Settlement Advisory Board allot at minimum 25% of the $40.9 million fund to urban, low income communities of color and of the African Descent population.

The data shows that vehicle emissions disproportionately impact our member population. According to NAACP and other reports, 'a pattern of "environmental injustice" suggests that

minorities may contend every day with disproportionate health risks from tailpipe exhaust, researchers at the University of Minnesota, writing in the journal PLOS ONE, have created a sweeping picture of unequal exposure to one key pollutant -- nitrogen dioxide, produced by cars, construction equipment and industrial sources -- that's been linked to higher risks of asthma and heart attack. They've found, all over the country, in even the most rural states and the cleanest cities, that minorities are exposed to more of the pollution than whites.

The biggest finding is that we have this national picture of environmental injustice and how it varies by state and by city," says Julian Marshall, a professor of environmental engineering at the University of Minnesota and one of the authors of the study along with Lara P. Clark and Dylan B. Millet. "The levels of disparity that we see here are large and likely have health implications."

Specifically, they found that minorities are on average exposed to 38 percent higher levels of outdoor NO2 than whites in the communities where they live, based on demographic data from the 2000 census. That gap varies across the country, though, and it's substantially wider in the biggest cities. Nationwide, the difference in exposure is akin to approximately 7,000 deaths a year from heart disease.'
According to POLOS
https://www.washingtonpost.com/news/wonk/wp/2014/04/15/pollution-is-substantially-worse-in-minority-neighborhoods-across-the-u-s/?utm_term=.6f9dca835118

We request that a qualifying criteria to obtain funding require environmental health outreach, education on alternative fuel, air pollution and asthma, and dissemination of asthma inhalers.

We also strongly believe that at least 20 electric vehicle buses along with installation of electrical charging stations should be allotted to urban school system meeting the most impacted demographics described.

Respectfully Submitted,

Barbara Bolling-Williams
Barbara Bolling Williams
President
Indiana State Conference of the NAACP

Denise Abdul-Rahman
Denise Abdul-Rahman
Environmental Climate Justice Chair
Indiana State Conference of the NAACP

SEALS, SHAWN

From: SEALS, SHAWN
Sent: Monday, October 01, 2018 7:07 AM
To: IDEM VWTrust
Subject: FW: Greenlots Comments on Revised Draft Mitigation Plan
Attachments: Greenlots IN Comments v2 9.28.18.pdf

For the record...

From: Emily Wier [mailto:ewier@greenlots.com]
Sent: Friday, September 28, 2018 2:35 PM
To: SEALS, SHAWN <SSEALS@idem.IN.gov>
Cc: Thomas Ashley <tom@greenlots.com>; Ashley Horvat <AHorvat@greenlots.com>
Subject: Greenlots Comments on Revised Draft Mitigation Plan

Shawn,

Please see the attached comments of Greenlots on IDEM's revised Draft Beneficiary Mitigation Plan. Please let us know if you have questions. We look forward to continued engagement with your office.

Emily Wier
Policy and Market Development, Greenlots
ewier@greenlots.com
619.952.2331

greenlots®

September 28, 2018

Shawn Seals
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, IN 46204

RE: Draft Beneficiary Mitigation Plan

Dear Shawn,

Greenlots appreciates the opportunity to provide the Indiana Department of Environmental Management (IDEM) with comments on the revised Draft Beneficiary Mitigation Plan and recommendations for funds disbursement.

Greenlots is a leading provider of electric vehicle (EV) charging software and services, and our smart charging solutions help site hosts and utilities manage dynamic EV charging loads. We leverage numerous partnerships to achieve successful charging solutions, including supporting a significant percentage of the DC fast charging infrastructure in North America. Our network supports Electrify America's growing nationwide fast charging network, which will provide EV drivers with fast charging options throughout Indiana. We are ready to collaborate with Indiana-based partners to create EV charging solutions.

1 - Greenlots strongly supports IDEM's allocation of the full 15% toward light-duty EV charging. The utilization of the maximum amount of funds toward public EV charging infrastructure can help give drivers the confidence they need to travel throughout the state and region. Public investments, such as through the Trust or utility-funded programs, are the primary means to create non-proprietary charging systems that can serve vehicles of all makes and models, and accommodate all Indiana EV drivers. To create an ideal consumer experience, a network of stations should be responsive, accessible, and connected on an open charging platform.

1A – Focus on open standards to build out EV charging networks. An open standards-based charging software (such as Open Charge Point Protocol v1.6)[1], which is the foundation for Electrify America's fast charging network and those of many utilities, is vital to minimize the likelihood of stranded assets. Open standards future-proofs both software-hardware communications and infrastructure interoperability. This approach is also critical to help protect ratepayers from poor investments.

[1] Greenlots. 2018. Open Standards Based Networks White Paper. https://greenlots.com/wp-content/uploads/2018/08/open-standards_white-paper_05.pdf

1B – Support the build out of the 'Crossroads of America EV Interstate Corridor.' Trust funds should be used to build a robust network of DC fast chargers, which provide drivers with a quick charge and are appropriate along corridors, in urban areas, and to support increasing electrification of ride sharing/ ride hailing/ car sharing fleets (e.g., BlueIndy in Indianapolis). Greenlots supports the initiative of the Indiana Energy Association (IEA) and its members to supplement the Trust funds with their own funds to build this corridor network, and maintain Indiana at the crossroads of America. IEA would be less sensitive to the financial pressures associated with owning and operating EV infrastructure, and better prepared for long-term stewardship of the sites and equipment. IEA members are in a position to proactively lead this infrastructure effort to provide charging solutions, rather than just waiting to see what types of site hosts apply. Starting with a vision for a strategic network can help best meet the state's objectives for EV adoption and create a positive EV driver experience.

This approach can help ensure more adequate statewide coverage, and that site hosts are properly vetted and considered. It also will not dilute the impact of deployment with different companies staggering installations, which can frustrate both site hosts and EV drivers. Funding just one coordinated program entity helps ensure that the EV driver experience is streamlined, is similar at disparate locations, and that there is ease of administration and accountability (of particular importance for charger maintenance). Ensuring compliance with hundreds of site hosts across the state is much more challenging than just interfacing with one program entity responsible for maintaining the infrastructure.

1C – Ensure all aspects of EV charging costs are covered to the maximum allowable. Acceptable costs should *at a minimum* include the following: site identification, hardware and software, installation, equipment warranty, and operations and maintenance. It is important that costs are covered to the maximum extent allowable, to ensure that the equipment is serviced and operational for the lifetime of the infrastructure. For an EV driver or those considering an EV purchase or lease, it is important to have confidence in the reliability of public charging infrastructure; Trust funds can be used to help reassure EV drivers.

2 – For the remaining funds, Greenlots supports increased electrification of Indiana's heavy-duty sector. We strongly encourage Indiana to take a step forward and develop a 21st Century mobility system. The Trust represents an unparalleled opportunity to transform the way goods and people move through the state. IDEM should consider funding electrification of transit buses, school buses, freight trucks, and other vehicles. Electrifying Indiana's heavy-duty sector will not only provide cleaner air for residents and visitors alike, but locally produced electricity will support more jobs that can be sustained well into the future, and keep hard-earned dollars in the state.[2]

2A – Evaluate proposals for the heavy-duty sector based on total cost of ownership. The remainder of Trust funds should be allocated based on the vehicle's total cost of ownership,

[2] NRDC. 2017. America's Clean Energy Frontier. https://www.nrdc.org/sites/default/files/americas-clean-energy-frontier-report.pdf

rather than just upfront costs. This adequately incorporates not just changes in available technology, but also long-term pollution and fuel costs associated with operations and maintenance of equipment – and the prolonged NOx emissions exposures that the Trust program is designed to mitigate. Research from McKinsey shows that while electric transit, shuttle, and school buses have higher up-front costs, they have reduced fuel and maintenance costs, a longer vehicle lifespan, greater potential to reduce criteria air pollutants and greenhouse gases, and provide health benefits for workers, schoolchildren, and community members.[3]

Acceptable costs should include the EV charging infrastructure for heavy-duty vehicles. As the use cases for transit/ school buses or freight trucks are very different from light-duty passenger vehicles, dedicated infrastructure for each vehicle type should be established and funded through the Trust.

2B – Build a clean energy economy for all Hoosiers. The economic savings through electrification of the heavy-duty sector can reverberate throughout the local economy, including health care savings, local job creation, and investment in locally sourced electricity. By investing in technologies that will provide for Indiana's future growth, IDEM can further advance priorities for environmental justice and disadvantaged communities.

Thank you for your consideration. Greenlots will be available as a resource to IDEM through the finalization and implementation of the Plan. Please do not hesitate to contact us should you have any questions.

Sincerely,

Thomas Ashley
Vice President, Policy

Ashley Horvat
Vice President, Public & Private Partnerships

[3] McKinsey. 2017. What's sparking electric-vehicle adoption in the truck industry? https://www.mckinsey.com/industries/automotive-and-assembly/our-insights/whats-sparking-electric-vehicle-adoption-in-the-truck-industry

SEALS, SHAWN

From: David Schatz <david.schatz@chargepoint.com>
Sent: Friday, September 28, 2018 10:30 AM
To: IDEM VWTrust
Cc: Dedrick Roper
Subject: ChargePoint's Comments on IDEM BMP
Attachments: Indiana VW BMP Comments ChargePoint.pdf

IDEM,

Please find attached ChargePoint's comments on IDEM's Draft Beneficiary Mitigation Plan. ChargePoint looks forward to continuing to be a resource to IDEM as it finalizes its plan and implements programs to support it.

Thank you,

David

David Schatz
Director, Public Policy
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September 28, 2018

Mr. Shawn Seals
Office of Air Quality
Department of Environmental Management
100 North Senate Avenue
Indianapolis, IN 46204

RE: Comments on Proposed Draft Plan for the Volkswagen Environmental Mitigation Trust

ChargePoint is pleased to provide this second round of written comments to the State of Indiana regarding the best use of funds stemming from the VW settlement and the State's allocation from the Environmental Mitigation Trust. The Trust funds provide a significant opportunity for the State to mitigate the environmental harm VW diesel vehicles caused, as well as advance key transportation segments that produce long-term benefits to the State and its communities.

In summary, we commend Indiana for committing the maximum 15% of its Trust allocation towards light-duty electric vehicle (EV) charging infrastructure. We note that over 30 states have elected to allocate the full allowable amount to light-duty EV charging infrastructure to date. Additionally, we urge the State to consider prioritizing the remaining investment into medium and heavy duty vehicle projects that utilize electricity as a fuel, are equipped with standard connectors, and charge at charging stations that are networked in order to report charging data to the State.

We believe that this investment in transportation electrification significantly contributes to the NO_x mitigation goals of the Environmental Mitigation Trust, and NO_x reductions from charging sessions are easily and empirically calculable. Moreover, funding for EV infrastructure is needed to meet the demands of today's 5,604 EV drivers in Indiana, let alone support the exponential growth of EVs in years to come. In a state that currently has just 281 public charging spots, this small portion of the investment could support over 1,754 additional public charging stations deployed in communities across Indiana.

ChargePoint is the largest electric vehicle (EV) charging network in the world, with charging solutions for every charging need and all the places EV drivers go: at home, work, around town, and on the road. With more than 54,000 independently-owned charging spots and thousands of customers nationwide, ChargePoint drivers have completed more than 40 million charging sessions, saving upwards of 41 million gallons of fuel and driving more than 1 billion electric miles. In addition, there are currently more than 200 ChargePoint public charging spots in the State of Indiana.

Recommended Eligible Mitigation Projects in Indiana: EV Charging and Electrification

ChargePoint strongly recommends that Indiana continue to commit the maximum allowable 15% for light-duty electric vehicle charging. The State's investment of just 15% could contribute to the deployment of over 1,700 charging spots. A simple rebate program providing $7,000 per dual port Level 2 charging station would support 1,754 new charging spots.

Example:

- $6,140,382 Trust Funds ÷ $7,000 rebate per dual port charging station = **877 dual port charging stations**
- 877 dual port charging stations x 2 charging ports on each station = **1,754 charging ports**

A rebate program can be applied to all property types, carries low administrative burden, and leverages private sector investment. In fact, many states have made an investment in EV charging a core part of draft and final plans.

There are several key reasons for Indiana to support 15% for EV charging infrastructure:

1. <u>15% for charging infrastructure could deploy over 1,700 charging spots across Indiana.</u>
    - Charging infrastructure is the most cost-efficient category for investment under the Trust.
    - EV charging stations can be deployed flexibly, with deployments easily tailored to State priorities and leveraging strong private sector demand.
    - Smart charging can give the State real-time insights into EV charging and transportation trends.
    - Within months, hundreds of charging stations would be installed and fully operational, and updated constantly over air.

2. <u>15% for charging infrastructure would provide a measurable and significant annual NOx mitigation.</u>
    - EV charging is the only category that offers real-time NOx mitigation measures.

- Captures data on kilowatt-hours consumed, which can be easily converted to electric miles driven.
- Charging infrastructure is the only eligible mitigation action that will increase NOx mitigation over time with greater EV adoption and a cleaner electric grid.

3. 15% for charging infrastructure will make Indiana a leader in advanced transportation technologies.
    - 35 States have already determined electric vehicle service equipment (EVSE) as part of their draft or final beneficiary mitigation plans and over 30 have elected the full 15%.
    - Current infrastructure is not adequate to meet the needs of today's EV drivers and prepare for future projected growth.
    - States are currently competing for preparedness in electrification, and Trust funds provide a unique opportunity Indiana to lead and become a target for investment.

4. 15% for charging infrastructure is part of a resilient transportation sector.
    - Charging is powered by the grid and keeps transportation fuel local.
    - Transportation fuel diversity mitigates risks for Indiana and its drivers.
    - Infrastructure is currently needed along evacuation routes, in order to address range security at a time of emergency.

Designing the right EV charging program for Indiana under the Trust

Light-duty electric vehicle infrastructure funding programs can be flexible in how they are distributed, whether they are solely responsive to the demand from the market and site hosts, targeted to specific use cases and geographically based allocations, or a hybrid of factors for distribution.

Light-duty electric vehicle charging infrastructure projects can align with the State's goals for the EV charging sector and complement existing infrastructure. Existing deployments in Indiana have focused around key municipalities and areas of higher density, but there are gaps to address in order to promote broader EV adoption in all communities. IDEM should determine that a funding program be designed to target areas that will drive the greatest near- and long-term utilization of charging assets. Focusing on utilization will significantly contribute to the success of the State's deployment. Additionally, the program can be structured to concentrate on local emissions reductions and prioritize specific non-attainment zones.

Rebate programs are effective in expediting charging station deployments and attracting a wide variety of site hosts. Rebate programs can be targeted to specific areas such as county, zip code, or city. Eligible regions or areas can be prioritized by NO_x emissions estimates, socioeconomic factors, traffic flows, and other factors. Rebate programs are typically first-come, first-served and support accelerated deployment with low administrative effort. In ChargePoint's experience, allowing for site hosts (ex. workplaces and retail establishments) to own and operate charging equipment, have skin in the game with a financial cost share, and manage the charging at their sites will lead to the highest utilization and best deployment.

EV Charging Technology: Make Smart Technologies a Standard Qualification

ChargePoint strongly recommends that the State make smart, networked charging features a prerequisite for EV charging program funding. Smart charging infrastructure is cloud-enabled to collect and report

real-time data on charging sessions, including energy use, frequency and duration of sessions, pricing, and availability to drivers. There are several reasons for incorporating only smart charging in this program:

1. Data from smart charging sessions can be used, real-time, to report NOx emissions mitigation.
2. Smart charging stations display availability to drivers and appear on maps, which helps promote driver confidence and greater utilization.
3. Charging networks allow site hosts to set pricing to drivers, which can help the business case for installation of charging assets and incent good charging behaviors.
4. Data from charging stations can be aggregated on any level (single station, region, state) to give the State insights into charging habits and inform transportation and grid planning.
5. Networked charging stations include remote diagnostics and "remote start" capabilities.
6. Software and firmware updates are made over the air, eliminating the need for a technician to visit site for vehicle or standards compliance updates.

None of the above functionalities are available on non-networked stations, and we believe and our experience shows that networked features carry a range of benefits for states, utilities, site hosts, and drivers. In addition, we believe that all of the above functionalities should be considered as baseline eligibility criteria.

Remaining 85% of Funds: Priority for Electrification Technologies

Beyond the 15% allocation to EV charging infrastructure, we encourage the State to allot a significant portion of the remaining 85% to electric fuel project categories over other fuel types. Electrifying the State's medium and heavy duty vehicles will lead to long-term transportation emissions reductions and increased efficiency.

Under the terms of the Environmental Mitigation Trust, funds used for transportation electrification projects in multiple categories may cover the cost of the vehicle/engine and associated charging infrastructure. Standard charging connectors should be required. ChargePoint notes that many medium and heavy duty EVs utilize a standard connector. Standard connectors increase economies of scale and ensures fleet operators are not locked into a specific technology provider. Investing in electric models and associated infrastructure with standard connectors could enable public light-duty charging stations to be utilized for bus charging and other fleet needs. In addition, across applications in the same category.

Fleets will likely have a variety of vehicles and many may not have telematics. To ensure the state is able to accurately quantify environmental benefits, charging stations should be networked. Networked charging stations have the ability to track all energy dispensed and provide an easy way to report on all NOx emissions reduced by the Trust fund investment. We also encourage the State to provide additional funding for vehicle replacement projects that include charging infrastructure. For example, fleets applying for Colorado's Volkswagen Mitigation Fund vehicle replacement program are eligible an additional $9,000 for networked Level 2 charging stations, and $30,000 for networked DC fast chargers. This additional incentive will encourage the state's fleet operators to transition to electricity as a fuel source and capture environmental benefits of all vehicles that use the charging stations.

Conclusion

Thank you for your continued public engagement and consideration of our comments. ChargePoint looks forward to continuing to be a resource to the State of Indiana as it designs a program to bring the benefits of electrification to communities across the State.

Sincerely,

David Schatz
Director, Public Policy
ChargePoint

SEALS, SHAWN

From: Bradley, Veronica <vbradley@airlines.org>
Sent: Friday, September 28, 2018 10:35 AM
To: IDEM VWTrust
Cc: Blake, Martin
Subject: Volkswagen Consent Decree Environmental Mitigation Trust Draft Indiana Beneficiary Mitigation Plan
Attachments: A4A comments on VW Plan_IN.pdf

Dear Mr. Seals:

Please find attached comments submitted on behalf of Airlines for America regarding Indiana's draft beneficiary mitigation plan. Should you have any questions or would like to discuss our comments further, do not hesitate to contact me at this email address or at the phone number provided below. Thank you.

Best,
Veronica

Veronica C.K. Bradley
Director, Environmental Affairs
Airlines for America
We Connect the World
1275 Pennsylvania Ave. NW, Suite 1300
Washington, DC 20004
(p) 202.626.4152 | (e) vbradley@airlines.org
airlines.org | Facebook | Twitter | Instagram | LinkedIn

Airlines for America®

We Connect the World

September 28, 2018

Submitted via email to VWTrust@idem.IN.gov

Shawn M. Seals
Indiana Department of Environmental Management
100 N Senate Ave
Indianapolis, IN 46204

Re: Volkswagen Consent Decree Environmental Mitigation Trust Draft Indiana Beneficiary Mitigation Plan

Dear Mr. Seals:

Airlines for America® ("A4A")[1] would like to thank the Indiana Department of Environmental Management ("IDEM") for the opportunity to comment on the Volkswagen Consent Decree Environmental Mitigation Trust Draft Indiana Beneficiary Mitigation Plan. A4A and its members are committed to environmental progress and view the Volkswagen Environmental Mitigation Trust ("Trust") as a unique opportunity to accelerate those efforts. This is why we support the State's proposal to include projects that replace or repower airport ground support equipment with all-electric forms ("GSE projects") as an eligible mitigation action in its Plan; however, we also have concerns about the proposed Plan that we raise below for your consideration.

First, GSE projects fully support Indiana's mission statement and overall goals for distributing the Trust funds. GSE projects are sustainable, positively impact the environment, enhance public health, and promote the economy. Jump starting GSE electrification at airports in Indiana will set them up to maintain all-electric GSE well beyond the first generation of equipment purchased with assistance from the Trust funds because the necessary charging equipment will be installed and available for generations of all-electric equipment to come. GSE projects positively impact the environment by not only mitigating the nitrogen oxide ("NOx") emissions the subject VW vehicles unlawfully emitted but by also eliminating other diesel emissions like particulate matter ("PM2.5"), hydrocarbons, carbon monoxide, sulfur oxides, and carbon dioxide. Eliminating this myriad of air pollutants will enhance the health and well-being of Indiana residents, and in particular, the communities surrounding airports in the State. GSE projects also promote the local economy. Airports are major hubs of economic activity and GSE projects will facilitate the movement of people and commerce each day in a more environmentally friendly way. In this way, GSE projects align well with IDEM's mission statement for the program.

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[1] A4A's members are: Alaska Airlines, Inc., American Airlines, Inc., Atlas Air, Inc., Federal Express Corporation, Hawaiian Airlines, JetBlue Airways Corp., Southwest Airlines Co., United Continental Holdings, Inc., and United Parcel Service Co. Air Canada, Inc. is an associate member.

GSE projects also align with the overall goals of the program. The goals of the Trust fund program are fourfold: (1) to improve air quality cost effectively, (2) to maximize diesel emission reductions focusing on areas with sensitive populations, (3) to consider projects that reduce emissions beyond just NOx, and (4) to encourage leveraging project partner funds to extend the reach of the program.

As we noted in our November 6, 2017 letter, our member airlines have unlocked state grant funds with cost-effectiveness thresholds in the past readying them to propose equally cost-effective projects to make real differences in the local air quality surrounding airports in Indiana. In fact, both Ohio[2] and Utah[3] have noted just how cost effective GSE projects are; markedly more so than many on-road equipment and vehicles to which Indiana is currently proposing to dedicate much of its funding. IDEM's analysis itself indicates that the average cost per ton of NOx reduced for non-road equipment is about $57,000, while that figure for on-road equipment is six times that at just over $342,000 per ton of NOx reduced. Yet, IDEM is proposing to dedicate only 20% of the Trust funds to non-road equipment versus the on-road sector's 58%. Moreover, IDEM estimates that based on this allocation of funding, Indiana will see only 34.73 tons of NOx reduced per year from the on-road sector while non-road mitigation projects will bring 66.83 tons of NOx reductions per year. This assessment shows that not only will non-road projects mitigate NOx emissions more cost effectively but also that more absolute NOx can be reduced by investment in non-road projects. Based on this, A4A recommends IDEM reconsider its allocation of Trust funds in favor of funding more non-road projects to support GSE projects and others in the sector that mitigate the most NOx in the most cost-effective manner.

In addition, GSE projects will maximize diesel emission reductions in areas with sensitive populations and localized diesel emission-producing activities. Based on data from EPA, many sensitive populations live near the Indianapolis International Airport, including low income, linguistically isolated, under-educated, and very young populations.[4] With our members' interest in converting diesel GSE to all-electric alternatives at Indianapolis International, these populations could see differences in air quality, particularly improvements in ozone and PM2.5 emissions, if the airlines could leverage funding from the Trust fund program. And, as noted above, these populations would also benefit from the other emissions reductions associated with GSE projects beyond just NOx and PM2.5. Again, GSE projects completely eliminate all associated hydrocarbon, carbon monoxide, and carbon dioxide emissions among other air pollutants.

Moreover, our member airlines recognize that as non-government entities they will have to share the capital costs of replacing airline-owned GSE with all-electric alternatives and are willing to provide the necessary capital, leveraged by the Trust funds, to upgrade their equipment to more environmentally friendly alternatives. This cost-sharing structure will undoubtedly extend the reach of Indiana's program creating greater benefits for all Hoosiers. GSE projects thus fully support IDEM's goals for the program.

A4A likewise notes that by the terms of the Consent Decree, GSE projects will advance Indiana's resiliency and preference for domestic fuel use. GSE projects convert diesel equipment to all-electric

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[2] Ohio Environmental Protection Agency, "Ohio Diesel Fleets: Applying for VW Funds 2018 Application Cycle" at 8 (June 20, 2018) *available at* http://epa.ohio.gov/Portals/42/documents/VW/Ohio%20Diesel%20Fleets%20%20Applying%20for%20VW%20Funds%20jun18.pdf.

[3] Utah Department of Environmental Quality, "DEQ's Cost-Per-Ton Analysis of Eligible Vehicles/Equipment Replacement Projects," https://deq.utah.gov/air-quality/deqs-cost-per-ton-analysis-of-eligible-vehicles-equipment-replacement-projects (last visited Aug. 21, 2018).

[4] U.S. EPA, *EJScreen: EPA's Environmental Justice Screening and Mapping Tool (Version 2018)*, EJSREEN MAPS, demographic indicators category, https://ejscreen.epa.gov/mapper/ (last visited Sept. 4, 2018).

alternatives switching the equipment from consuming potentially imported sources of fuel to domestically produced electricity.

And notably, supporting GSE projects specifically at Indianapolis International, home to the largest airport-based solar farm in the world, would further highlight the airport's sustainability leadership. This is yet another reason for IDEM to support proposals for GSE projects in the State.

Lastly, A4A encourages IDEM to reconsider its decision not to fund fleet-specific, heavy-duty, electric infrastructure costs. As we noted in our November 2017 letter, electric GSE cannot be deployed without supporting infrastructure such as onsite power distribution and sufficient point of use recharging equipment, which typically is owned and operated by airport operators, who most often are public entities. Without support to install the associated electric infrastructure, we fear airports in Indiana will not be able to invest the resources necessary to prompt GSE projects in the State, forcing airlines to pass up this opportunity to bring air quality improvements to the communities surrounding airports in Indiana.

*****

Thank you for your consideration. Please let us know if you have any questions regarding our comments, and we look forward to working with IDEM and the State moving forward.

Sincerely,

Veronica Bradley
Director
Environmental Affairs
Airlines for America

CC: Martin Blake, Manager, Office of Aviation, Indiana Department of Transportation, mablake@indot.in.gov

SEALS, SHAWN

From: Casey Holsapple <cholsapple@Kinetrexenergy.com>
Sent: Friday, September 28, 2018 10:53 AM
To: IDEM VWTrust
Cc: Casey Holsapple
Subject: Kinetrex Comments for Indiana Volkswagen Mitigation Trust
Attachments: Kinetrex 9-28-18 Comments.pdf

Please see attached the additional comments of Kinetrex Energy regarding the Indiana Volkswagen Mitigation Trust Program. If you have any questions, please let me know. Thanks.

Casey M. Holsapple
Vice President
Governmental Affairs and RNG Development
Kinetrex Energy
129 E. Market St., Suite 100
Indianapolis, Indiana 46204
Email: cholsapple@kinetrexenergy.com
Direct: (317) 749-0732
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Kinetrex Energy

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Kinetrex Energy

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September 24, 2018

Commissioner Bruno Pigott
Mr. Shawn M. Seals
Indiana Department of Environmental Management
Indiana Government Center North
100 North Senate Avenue
Indianapolis, IN 46204

Dear Commissioner Pigott and Mr. Seals:

Kinetrex Energy respectfully submits the additional comments regarding the Volkswagen Environmental Mitigation Trust (Trust). Kinetrex appreciates the collaborative process used by IDEM to organize the comments regarding the Trust and looks forward to working closely with our own customers to pursue funding that will further the goals of the Trust. Further, the proposed changes made so far to the plan to include LNG will improve the chances that the settlement funds will reduce NOx and greenhouse gas emissions in the State of Indiana.

As a point of clarification, the current trust plan appears to require that new funding go towards vehicles that are owned and operated by the grantee. This should be amended to allow for any vehicle, leased or owned, to be included as a potential project in the grant program if the vehicle is titled in Indiana. In the interest of deploying as many natural gas vehicles into the state, some customers want to decrease their long-term risk by leasing vehicles rather than buying them. If the vehicles are used in Indiana, the state will receive the desired NOx emissions reductions. Further, using grant proceeds for leases will have a smaller overall impact on the grant funding.

As stated in our prior comments, Kinetrex continues to support the Trust and its efforts to further private and public fleet adoption of alternative fuels. We encourage IDEM to evaluate projects on a life cycle basis, including all fuel inputs and overall energy consumption data. Renewable natural gas (landfill gas or gas created through the anerobic digestion of animal waste) provides incredible value from both an economic and an environmental standpoint. Current natural gas engines for Class 8 vehicles are more cost effective at NOx and greenhouse gas reductions than electric or clean diesel. Replacing an existing diesel Class 8 vehicle with renewable natural gas can eliminate over a ton of NOx and more than 1,000 tons of greenhouse gases over a 10-year lifecycle.

Should you have any questions about these or our prior comments, please let me know.

Sincerely,

Casey M. Holsapple

SEALS, SHAWN

From: Christopher Anderson
Sent: Friday, September 28, 2018 10:08 AM
To: IDEM VWTrust
Subject: Increase the investment in EV Infrastructure

Dear Commissioner Pigott,

Thank you for the work that the Indiana Department of Environmental Management does to use the VW Trust funds to ensure the strength of the Indiana economy and the health of Hoosiers. It is important to remember that these funds come from Volkswagen's criminal attempts to evade regulation, and to view this fund as a transition to a healthier transportation infrastructure.

IDEM's current proposal places an upper limit of 15% of the funds to be used for Electric Vehicle (EV) infrastructure. I ask that IDEM request a waiver from this requirement and invest 50%-100% of the funds into building stronger electric vehicle infrastructure in Indiana. This is good for both the Indiana economy and Hoosier Health.

Sincerely,
--
Topher Anderson

SEALS, SHAWN

From: John Laswell
Sent: Thursday, September 27, 2018 6:25 PM
To: IDEM VWTrust
Subject: Potential Usage | DC Fast Charging Investment

Firstly, thank you for investing in our current and future infrastructure through this program. We are a recent EV family as of just this August, and are encouraged to hear of the potential for DC Fast Charging expansion throughout our state.

Secondly, I have heard of recommendations from the IDEM to release these funds rather than further studies. I completely agree that now is the time to invest in implementation, as the long-lasting benefits of DC Fast Charging stations impact both travelers and surrounding businesses as soon as they are available.

Lastly, I'm a frequent commuter of I-65 between Indianapolis and Louisville. The continuing improvements and expansion of this interstate only shows the need for more support towards the growing EV investment by fellow Hoosiers as well. Our family is looking to be a more sustainable household, plus the safety and technology coming (and already present) for available EVs is increasing their adoption.

I hope you'll consider these direct benefits to everyday Hoosiers looking to make a difference within our state.

Thanks for the work you do,

John Laswell

SEALS, SHAWN

From: Teresa McCaskey >
Sent: Thursday, September 27, 2018 8:04 PM
To: IDEM VWTrust
Subject: VW mitigation funds

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

I am encouraged to see the IDEM discussion on using the mitigation monies to extend the charging stations available for zero emissions vehicles. As an electric car owner I can see that encouraging and supporting electric vehicles will support the state in several ways:

indicates a statewide effort to work toward a better air-quality
shows that IN can keep pace technically
encourages tourism rather than IN avoidance by electric car owners

In our travels we stop at many charging stations and recognize that the time presents an opportunity to partake in local businesses and support the local economy. DC fast chargers associated with larger business concern or walkable areas makes for the best user experience and encourages positive reports on social media. Food and restroom availability are a minimum requirements of a charging site. Shopping areas, restaurants, recreational areas and museums are some of the perks we have seen in other states.

I am glad to hear that DC fast chargers may soon be available in Indiana.

Teresa McCaskey
Elkhart

Sent from my iPad

SEALS, SHAWN

From: Andrew Whitesel <andrew@weetz.com>
Sent: Thursday, September 27, 2018 8:33 PM
To: IDEM VWTrust
Subject: One possible thing to do with the VW settlement money

I operate 10 daily FedEx Ground delivery routes and have entertained the idea of purchasing electric or electric/gasoline hybrid delivery vehicles. Many other states are using some of the VW settlement dollars to incentivize the replacement of diesel trucks with electric trucks. I'm interested in doing this if I can do it without losing money.

Andrew Whitesel, President
Weetz, Inc. (A FedEx Ground Contractor)
317-507-7414

SEALS, SHAWN

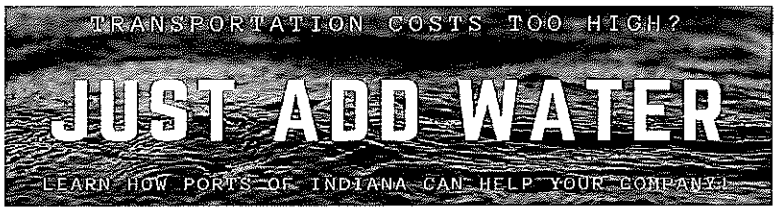
From: Ian Hirt <ihirt@portsofindiana.com>
Sent: Thursday, September 27, 2018 1:14 PM
To: IDEM VWTrust
Subject: Port of Indiana Comments - VW Mitigation Trust Fund
Attachments: img-927121140-0001.pdf

Dear Sir or Madam,

Attached please find the comments from the Port of Indiana - Burns Harbor concerning the Beneficiary Mitigation Plan for the Volkswagen Mitigation Fund.

Thank you very much for your consideration. Please do not hesitate to contact me if you have any questions.

Ian Hirt
Port Director
p: 219.734.7076 m: 219.628.1744
6625 South Boundary Drive, Portage, IN
PORTS OF INDIANA
3 PORTS • 2 WATERWAYS • 1 SYSTEM



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WWW.PORTSOFINDIANA.COM

September 27, 2018

IDEM – Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204

Re: Beneficiary Mitigation Plan - Volkswagen Mitigation Trust Fund

Dear Sir or Madam,

On July 17, 2018, the Port of Indiana – Burns Harbor had the pleasure of hosting a discussion on the proposed Beneficiary Mitigation Plan for the Indiana Volkswagen Mitigation Trust Fund. It was an excellent presentation, but there is one item that was raised which the Port of Indiana Burns Harbor finds quite disconcerting. Tentatively, 78% of the funds available are scheduled to be allocated to Onroad and Nonroad Equipment and Vehicles (56% and 22% respectively) while only 4% of the funds are scheduled for DERA Option Project Types. At the Port of Indiana Burns Harbor, nearly all of the cargo handling equipment is powered by diesel fuel. Due to the size and power of the engines required to operate this equipment, electric power is not yet a realistic alternative power source. The same is true with the tugboats utilized at the Port and there are no ships on the Great Lakes which are powered by only electricity. Therefore, while much of the funding in the proposed Beneficiary Mitigation Plan would seemingly be applicable to Port operations, in actuality very little of the funding will be applicable to Port projects. As Port Director for the Port of Indiana Burns Harbor, I would respectfully request that the funding for DERA Option Projects be raised to a minimum of 10%. The flexibility offered under DERA would greatly benefit the 25 port companies located at the Port of Indiana Burns Harbor as well as the trucks which carry cargo to/from our docks and the tugboats which assist in bringing cargoes to/from our Port.

Thank you very much for your consideration.

Ian R, Hirt
Port Director
Port of Indiana – Burns Harbor

SEALS, SHAWN

From: Carl Lisek South Shore Clean Cities <clisek@southshorecleancities.org>
Sent: Thursday, September 27, 2018 4:56 PM
To: IDEM VWTrust
Subject: South Shore Clean Cities VW Trust Comments
Attachments: South Shore Clean Cities -Comments 9 27 18.pdf

Carl Lisek | Executive Director
South Shore Clean Cities, Inc.
123 Main Street, Suite 202, Crown Point, IN 46307
Your Source for Diesel Emission Reductions!

(O) 219-644-3690 | (C) 630-207-1760 (best number to reach me)
Email: clisek@southshorecleancities.org
Website www.southshorecleancities.org

South Shore
Clean Cities, Inc.

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September 27, 2018

Shawn Seals
Senior Environmental Manager
Indiana Department of Environmental Management
VWTrust@idem.IN.gov

RE: South Shore Clean Cities Comments on the Indiana Volkswagen Mitigation Trust Program's Draft Beneficiary Mitigation Plan

Dear Mr. Seals,

South Shore Clean Cities (SSCC) is pleased to submit these comments on the Indiana Volkswagen Beneficiary Mitigation Plan (BMP) Draft Framework. SSCC is a 501(c) (3) organization under the U.S. Department of Energy's Clean Cities program. The coalitions are designed to reduce petroleum consumption in the transportation sector by advancing the use of clean fuels and vehicle technologies that include, idle reduction, diesel emission reductions, hybrid electric vehicles, fuel blends and fuel economy while reducing dependence on imported oil. SSCC also represents the State of Indiana with IDEM as co-chair on the U.S. Environmental Protection Agency's Midwest Clean Diesel Initiative (MCDI). On August 29, 2018, IDEM published its revised Draft Indiana Beneficiary Mitigation Plan and requested comments.

Per that request, SSCC submits the following:

- South Shore Clean Cities agrees with Gov. Holcomb that the VW Mitigation projects should be transformative. Working with our hundreds of Indiana stakeholders -- who represent industry, government, schools, universities, ports and nonprofits – over the last 19 years, SSCC does not believe allotting more funds to on-road groups would meet the transformation goals. We assert that transformational projects will most likely come from nonroad- and Diesel Emission Reduction Act (DERA)-eligible projects, which include more non-traditional equipment. **SSCC believes the existing 4 percent allocated in the BMP should be increased to the 10 percent originally proposed in IDEM's draft framework.**

- After participating in various VW mitigation public meetings throughout the state, it became clear many Indiana stakeholders in a variety of sectors share SSCC's concerns about the decreased allotment of funds for nonroad projects.

- SSCC also notes that Indiana port companies may be interested in additional options beyond electric, as currently written in the BMP. Returning the allocation to 10 percent would provide additional flexibility and increase options for improving air quality in and around Indiana's three ports.

South Shore
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- SSCC also would note that unfortunately in many geographic regions of the state, alternative fuel infrastructure does not exist to support non-diesel options for public and private entities to install the necessary infrastructure for alternative fuels is beyond the means of most.

In meeting with stakeholders and members throughout the state and conducting fleet analyses for them, it became abundantly clear that the benefits of the VW mitigation trust program would be maximized by increasing the DERA option back to the 10 percent as originally proposed. Doing so would increase the number of eligible projects, thereby increasing the diesel emission reductions across the state and maximizing the benefits of the trust funds.

Thank you for taking our comments into consideration and for this opportunity to participate in this public process.

Sincerely,

Carl Lisek

Carl Lisek
Executive Director
South Shore Clean Cities

Cc. South Shore Clean Cities Board of Directors

SEALS, SHAWN

From: SEALS, SHAWN
Sent: Friday, September 28, 2018 7:15 AM
To: IDEM VWTrust
Subject: FW: Comment on August 2018 VW Trust Mitigation Plan

For the record...

From: Jack E Leonard [mailto:indyjel@gmail.com]
Sent: Thursday, September 27, 2018 7:09 PM
To: 'VW' <Trust@idem.in.gov>
Cc: SEALS, SHAWN <SSEALS@idem.IN.gov>
Subject: Comment on August 2018 VW Trust Mitigation Plan

I am Jack E. Leonard and I am writing on behalf of Improving Kids' Environment, IKE, an Indiana not-for-profit which works to reduce anthropogenic environmental hazards to Indiana's children. Improving Kids' Environment is dedicated to helping protect children from all environmental hazards. We appreciate the opportunity to comment on the August 2018 Draft Indiana Volkswagen Beneficiary Mitigation Plan (BMP).

I spoke at the Nora Library, Indianapolis, meeting before representatives of IDEM and of the Governor's VW Settlement Advisory Committee at the start of this process. What follows are IKE's comments.

One of our top priorities is to protect children from fine particulate matter, a major contributor to a number of heart and lung disorders, including triggering asthma attacks in susceptible children. Since asthma is a debilitating disorder resulting in chronic emergency room visits for many families, reducing its incidence is an important priority for the Indiana State Department of Health and many other health organizations.

Among other respiratory hazards to growing children, breathing diesel exhaust (fine particulates [=soot]) is both significant and widely distributed in both small and large cities. Thus, it is probably among the largest contributors to childhood respiratory health problems, especially in low-income urban areas.

We are sorely disappointed that the draft Indiana Beneficial Management Plan (BMP) does not adequately target the short- and long-term *elimination* of diesel soot from trucks and buses driving stop-and-go in residential areas.

Instead the plan sets aside a large proportion of the funds for providing new diesel engines for nonroad and DERA projects. The proposed BMP's ranking metrics largely ignore reducing particulate matter, focusing es on reducing annual atmospheric NO_x concentration. While that was what VW was jiggering with, nothing in the settlement requires that pollutant to be the deciding issue. And since NO_x is not a significant problem in Indiana, why does IDEM place it above the interests of children in the playground or on sidewalk when the delivery truck or school bus is smoking by? It seems to us that atmospheric NO_x (which is a seasonal contributor minor elevations of ozone in a limited part off the state) is of very secondary concern for protecting vulnerable children compared to daily daily soot intake from exhaust through the whole year. Thus, IDEM has skewed the process away from protecting citizens toward simplifying business as usual.

Moreover, by emphasizing cost-effectiveness instead of public health, the BMP skews the selection process by favoring projects based solely on lower the $/device per pound of NO_x emitted which in turn favors old technology (diesel)

instead of new technology using fuels such as propane, natural gas, hydrogen and electricity which within the urban neighborhoods add little to no particulate matter and only minor NO_x emissions..

And the NO_x reduction is itself not guaranteed. So-called "clean" diesel engines use a complex, expensive filtering system to remove soot from the exhaust before venting to the atmosphere. That is an imperfect system which wears out over time, requires regular addition of fluid and regular maintenance. Manufacturers know that some owners remove the treatment system to obtain better fuel economy and performance and to avoid maintenance, additive, and replacement expense. Short-haul alternative fuel vehicles are generally more cost-effective than diesel if lifetime costs are included and such vehicles require no regular maintenance while providing negligible soot emissions.

A transformative use of the funds by the Hoosier state requires a BMP that

- would favor a changeover in school buses and short-haul fleets driving through residential neighborhoods rather than business as usual, and
- would replace diesel engines *not* with newer diesel engines but with new fuels producing intrinsically cleaner exhaust and that would prioritize methods ensuring that future Indiana children will not breathe dangerous particulates from diesel exhaust in their formative years.

Jack E. Leonard, Ph.D.

President, Environmental Management Institute, Indianapolis

Board Secretary, Improving Kids Environment, Indianapolis

From: Greg Kempf < _
Sent: Wednesday, September 26, 2018 3:37 PM
To: IDEM VWTrust
Subject: Indiana Volkswagen Mitigation Trust Program Comment

The current draft of the Volkswagen mitigation funds places an upper limit of 15% for electric vehicle recharging infrastructure. Indiana should increase this amount far more so our state can utilize the money to accelerate the fast charging infrastructure. This would increase the number of chargers along highways as well as near shopping centers, parks, and other public sites to encourage more electric vehicle purchases and improve Indiana's air quality, currently one of the poorest in the nation.

Utilizing existing chargers will keep costs down, so more can be installed. They should be compatible with the 350 kW standard planned for the Electrify America project, enabling fast recharging for planned larger EVs, such as tractor trailers. Another consideration would be to combine the funding with adjacent states to maximize its effect, such as was done for the West Coast Electric Highway and the Western States Fast Charging Networks. A joint effort with private industry with high cost sharing would be yet another alternative to increase infrastructure. This will help Indiana remain competitive for future jobs both from infrastructure jobs and from further development of electric vehicles and their components.

Increased vehicle electrification will improve Indiana's overall air quality far more than cleaner diesels and the state will reduce greenhouse gas reductions and other environmental hazards that affect our health. Use these funds to make a lasting improvement to our state by investing in its future.

Thank you for your consideration,
Greg Kempf, Avon, Indiana

September 26, 2018

Commissioner Bruno L. Pigott
Mr. Shawn Seals, Office of Air Quality
Indiana Department of Environmental Management
Volkswagen Mitigation Trust
VWTrust@idem.IN.gov

RE: Volkswagen Settlement Mitigation Trust Fund Comments

Dear Commissioner Pigott and Mr. Seals:

The Indiana Municipal Power Agency ("IMPA" or the "Agency") appreciates the opportunity to submit these comments in response to the Indiana Department of Environmental Management's ("IDEM") request for comments regarding its Draft Beneficiary Mitigation Plan ("BMP"). IMPA is a not-for-profit joint action agency, formed in 1980 by municipally-owned electric utilities in Indiana to collectively share the cost of electric generation and transmission. Today, IMPA provides low-cost, reliable and environmentally responsible wholesale electric power to 60 municipal electric communities in Indiana through a diversified power supply portfolio. Those resources include three subcritical coal steam units, four supercritical coal steam units, seven natural gas combustion turbines, and seventeen solar parks—in addition to other resources procured through power purchase agreements and market purchases.

I. IMPA SUPPORTS THE ALLOCATION OF RESOURCES TO LEVEL 1, LEVEL 2, AND FAST CHARGING STATION PROJECTS THROUGHOUT THE STATE

IMPA supports the largest possible allocation of trust funds to light-duty electric vehicle infrastructure projects. The Agency believes that the installation of electric vehicle charging stations in its members' communities, and throughout the state, will provide a long-term benefit to Indiana residents. The dissemination of EV stations will provide the necessary infrastructure for electric vehicle users' travel to Indiana's cities and towns, will serve to address concerns or reservations that individuals may have regarding the potential use of electric vehicles when travelling throughout the state, and will encourage economic development by attracting sustainability-conscious businesses and talent. The resulting increase of electric vehicle use will have a long-term impact that decreases vehicle emissions and benefits the environment.

IMPA supports an open-ended framework for distributing charging station resources, and eagerly anticipates contributing to the formation of the application process for allocating the resources within this category. A broad application process available to all Indiana communities will provide the most benefit to the citizens of this state, and will allocate the settlement funds more efficiently. IMPA opposes limitations that would allow charging station applications only within certain corridors. The proposal to limit allocation of EV station funds to these corridors provides a redundant incentive to build stations for which there may already be sufficient demand. Subsidies, in this case, are necessary where market forces are insufficient to incentivize implementation of adequate infrastructure. Denying applications from participants outside of the limited corridors described above would exclude those communities that would most benefit from the receipt of settlement funds.

A broad application of charging station funds will provide the greatest long-term benefit to the development of electric vehicle infrastructure in this state. Allocating settlement funds to communities beyond the highway corridors allows municipalities and private investors to make electric vehicle use viable in communities where it is currently impractical. The resulting increase in electric vehicle use in these communities will contribute to the viability of infrastructure development throughout the state by increasing aggregate demand for charging services.

Broad implementation of EV infrastructure in Indiana's communities will benefit the state generally through widespread increased electric vehicle use, and will benefit individual communities by mitigating any potential barriers to visiting these communities using electric vehicles. Allocating funding toward Indiana's municipalities more broadly will allow electric vehicle owners to visit and do business in Indiana's municipalities that are essential to the state's economic development, but are not necessarily located along major roadways.

Facilitating creation of this infrastructure will increase the viability of electric vehicle use for decades to come. As such, IMPA believes that IDEM should direct resources within this category exclusively toward electric charging stations. The Agency does not recommend that IDEM divert resources devoted to this purpose to other forms of light-duty vehicle infrastructure and equipment. While the reimbursement rate schedule described by Section 9(c) in Appendix D-2 of IDEM's proposal is an appropriate framework with respect to EV charging station construction, IMPA suggests that the proposal should omit the allocation of EV station funds to hydrogen cell dispensing stations. IMPA supports the largest possible allocation of resources to EV charging stations. Allocating funds toward alternative infrastructure would diminish the potential impact on EV infrastructure improvements that a more focused approach would provide. IMPA supports the prioritization of electric vehicle infrastructure in the implementation of this proposal, and the inclusion of hydrogen fuel cell supply equipment will serve to dilute the funds available for that purpose. The economic viability of the technology at this time is suspect, and hydrogen fuel cell

use in Indiana is limited. Electric vehicle sales, however, are increasing. Focused investment in charging stations will accelerate this growth and will more effectively achieve positive environmental outcomes.

II. IMPA SUPPORTS THE ALLOCATION OF SETTLEMENT TRUST FUNDS TO ONROAD AND NONROAD EMISSIONS REDUCING VEHICLES

IMPA supports IDEM's proposed allocation of settlement funds toward Class 4-8 trucks and buses, in addition to funds allocated to electric and emissions-reducing vehicles and equipment for ports, airports, and other industrial uses. In particular, IMPA supports allocation of resources to electric vehicles and equipment within these categories. The adoption of electric vehicles in the relevant categories will continue Indiana's progress in the reduction of emissions throughout the state. An effort to shift toward electric vehicle use will have substantial environmental benefits, as discussed thoroughly in the comments previously provided by IEA and Duke Energy in March of this year. The emissions reductions experienced as a result of the switch to electric vehicles will only improve as generation resources become cleaner and more efficient. Generation resources continue to increase in efficiency as technology in this area advances and continues to reduce emissions from new and existing resources. IMPA's generation portfolio continues to increase its share of renewable and low-emissions resources. The Agency expects this trend to continue for IMPA, and for the industry at large.

The allocation framework described in IDEM's proposal with respect to these categories is appropriate under the circumstances. IMPA is eagerly anticipating the implementation of IDEM's proposal, and would like to have a role in forming and refining the application process for disbursements under the plan.

III. CONCLUSION

IMPA generally supports IDEM's proposed Beneficiary Mitigation Plan. The Agency supports the prioritization of electric vehicle use in the implementation of the plan, and recommends a broad application process that makes these resources available throughout the state.

Sincerely,

INDIANA MUNICIPAL POWER AGENCY

Raj G. Rao
President & C.E.O.

Enclosure: IMPA 2017 Annual Report

From: Greg Grant <
Sent: Wednesday, September 26, 2018 7:33 PM
To: IDEM VWTrust
Subject: Indiana's Plans for the Volkswagen Environmental Mitigation Trust Funds

The Honorable Bruno L. Pigott, Commissioner
Indiana Department of Environmental Management
Indiana Government Center North
100 North Senate Avenue
Indianapolis, IN 46204

RE: Indiana's Plans for the Volkswagen Environmental Mitigation Trust Funds

Dear Commissioner Pigott:

Thank you for all that Indiana Department of Environmental Management (IDEM) has done to pull together Indiana's industry, university, local governmental, other organizational and individual citizen interest in best utilizing the $41 million in settlement funds available to Indiana from our Nation's settlement with Volkswagen (VW) over their criminal efforts to evade our regulation intended to assure all Americans that the vehicles in use are minimizing the toxic pollutants to which we are all exposed.

Even the cleanest diesels emit corrosive and unhealthy smog-forming gasses, not just nitrogen-oxides, but also hydrocarbons, sulfur-oxides, fine particulate matter, carbon-monoxide and, perhaps worst of all, carbon-dioxide. As shown by Indiana's Climate Change Impact Assessment, conducted by scientists at Purdue, IU and other Indiana universities, carbon-dioxide has been accumulating in our atmosphere, trapping more solar radiation gradually overheating our atmosphere and oceans, increasing sea level and acidity, and causing more extreme weather and other increasingly costly stresses to Indiana's environment, infrastructure, property and our lives. To reduce these emissions, VW and other vehicle manufacturers are shifting rapidly to electric propulsion, rather than cleaner diesels. However, the latest draft plan calls for much of the funding to go for "cleaner" diesels. Instead, these funds should be used primarily to improve Indiana's fast-charging infrastructure for electric vehicles (EVs). This clean-energy infrastructure will maximize the benefit to Indiana's air quality and Hoosiers' health, our overall environment and our economy by enabling EVs of all types to be "refueled" quickly and conveniently, utilizing truly non-polluting, cost-effective solar, wind, and other renewable electricity produced right here in Indiana.

The latest draft plan places an upper limit of 15% (~$6.1M) of the funds for EV recharging infrastructure, consistent with a requirement of the VW settlement. However, Indiana should request a waiver of this limit, so our state can much more effectively utilize this money to stimulate private investment in Indiana's EV Fast-Charging infrastructure. The network can be built along Indiana's existing network of state and interstate highways, and inside our cities and towns, conveniently located at today's refueling stations, office buildings, shopping centers, parks, etc., in close proximity to highway access points.

The fast-charging network should leverage existing fast-chargers and comply with national standards by utilizing adapters where needed. It should be compatible with the 350 kW standard currently planned by European auto manufacturers and the Electrify America project, enabling fast-charging of all types of current and future EVs, including linehaul trucks. This approach could enable Indiana's

network to be grown alongside similar efforts in adjoining states and other regions, such as the West Coast Electric Highway project and the Western States Fast Charging Network that will utilize $65M in VW trust funds in Arizona, New Mexico, Colorado, Idaho, Wyoming, Montana, Nevada and Utah, as announced last October. By coordinating with other states and regions, Indiana will be in position to take full advantage of the developing nationwide network and a compatible network in Canada, similar to the network envisioned by the Electrify America project. This coordination will help Indiana to remain globally competitive for future jobs here in Indiana, particularly jobs that will spring from the application and further development of clean energy and transportation technologies.

Increased vehicle electrification will improve Indiana's air quality far more than cleaner diesels, and also increase the overall benefits to our state when we account for the benefits resulting from greenhouse gas reductions, as well as other health, environmental and economic benefits. Also, specifying that these trust funds be awarded with at least 50% private cost-sharing and by selecting contractors with the best timing and highest cost-sharing, we can further multiply the benefits from the investment of these funds in Indiana's fast-charging infrastructure.

In reviewing the comments submitted by others so far, it is clear that many others concur with the view that we need to spend more than just the 15% ($6 million) of the $41 million on EV charging infrastructure. I would add that my view is based on my own experience that includes 40 years in engineering with a primary focus on developing new transportation products and systems enabled by rapidly advancing electronics, including GM's EV1 and other electrified vehicles, starting with 10 years for General Motors' Detroit Diesel Allison Division, 4 years with the New Products Development group in GM's Economics Staff, and then 25 years with GM's electrical, electronics and engine management component divisions spun off in 1999 as part of Delphi Automotive. Likewise, it is also clear that, while GM clearly led the global competition in vehicle electrification with its Impact/EV1 in the early-90's and more recently with its plug-in hybrid Volt (range-extended EV) and its excellently designed 238-mile range battery-EV Bolt, GM and the rest of the U.S. auto industry are now all in need of renewing U.S. leadership to stay competitive globally, as the world is moving rapidly to realize the benefits of vehicle electrification, particularly when using electrical power generated with wind, solar and other renewable energy sources.

To summarize, by investing the entire $41 million in settlement funds to stimulate private investment for developing Indiana's EV fast-charging infrastructure, we would make a much larger and lasting improvement to our state's economy, our environment and our overall health. Other states and nations are investing in the same fast-charging infrastructure needed up front to enable clean EVs to become practical as a primary means of transport for most needs. Here in Indiana, we should do so as well, and preferably better, for our own benefit, but also together with our neighboring states and the rest of our nation to multiply the benefits to everyone. Therefore, I strongly urge that Indiana request the waver as noted, so that Indiana can utilize the full $41 million in settlement funds to invest in the crucial, enabling EV fast-charging infrastructure needed throughout Indiana. Doing so will make a much larger and long-lasting improvement to our state.

Sincerely,

Gregory L. Grant
Carmel, Indiana

From: Spencer Johnston · i>
Sent: Wednesday, September 26, 2018 9:23 PM
To: IDEM VWTrust
Subject: VW Funds - EV Charging Infrastructure

Hello IDEM,

I hope this email reaches you well. Thanks for the forward-thinking proposal for utilizing the maximum amount of funds 15% (~$6M) for EV charging.

I would like to share my opinion and simple ideas for the use of the EV charging funds. My experience with EV charging comes from owning a Tesla Model S and Model 3 and driving a combined 38,000 miles with these two vehicles since August 2016. I've made a number of long-distance trips utilizing DC fast charging (Tesla Superchargers), some of the destinations include Chicago, Panama City Florida, State College Pennsylvania, Cleveland Ohio, Traverse City Michigan, etc. And have also made a lot of trips that don't require DC fast charging. These including multiple camping trips to Indiana State Campgrounds where I charge via 50amp RV outlet at the campsite or day trips to locations that have Level 2 (destination charging IMO).

My opinion on fund usage:

1. Release funds immediately without a long period of time for study.
2. Give a larger portion of funds for DC fast charging with a minimum charging capacity of 120kw per charging stall.
    - Place DC faster chargers along I-65, I-70, I-74, I-69; spaced out every 75 miles;
    - Locations of DC faster chargers should not be at highway rest stops. Instead, they should be located just off exits and within walking distance to restaurants. These restaurants or hotels typical allow the use of existing park lots as EV owners are potential customers for them. ie copy the Tesla locations. No study period needed :)
    - DC charging stations should be 8 stalls at least with room to expand.
    - Charging fee-based on energy usage (kwh), and should be equal to residential electricity costs per kwh plus 1-2 cents per kwh.
3. Include Level 2 destination charging at strategic tourist spots in Indiana including major city centers. This will attract EV tourist to these spots for day trips, possibly eliminating the need for DC fast charging on these trips.
    - Locations to consider: All State & National Parks, Indianapolis, Evansville, Bloomington, Fort Wayne, Michigan City, Elkhart, Columbus, etc
4. If there's any money left over, use it for a workplace Level 2 charging program that allows businesses to provide charging at employee parking lots and garages. The program would pay for installation and equipment, maintenance would be the responsibility of the employer.

Again thanks for the opportunity to comment and thanks for planning & implementing an EV charging program for the State of Indiana.

Feel free to call me if you want to discuss further or would need any help.

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Thanks,

Spencer

From: Myrna Gray
Sent: Wednesday, September 26, 2018 10:58 PM
To: IDEM VWTrust
Subject: Indiana's Fast-Charging Network

Greetings. I am writing to make the case for investing Indiana's portion of the $41 million Volkswagen diesel emissions settlement in fast-charging infrastructure. Please request a waiver to allow use of all of the funds to advance this urgently needed system. Cleaner diesel is still diesel and its emissions will add to the already very damaging load of carbon dioxide, as well as other pollutants, in our air. Because climate change accelerates as CO2 levels rise, we must facilitate clean transportation rapidly. Electric vehicles are necessary for a livable future and charging stations are absolutely essential. Let's make the most of this windfall by building for the future.

Myrna Gray

From: Dori Chandler
Sent: Thursday, September 27, 2018 11:27 AM
To: IDEM VWTrust
Subject: Tust Fund Settlement Comments

To Whom It May Concern,

Indiana's share of Volkswagen's diesel emissions scandal settlement is $41 million. Instead of these funds going for "cleaner" diesels, the funds should primarily be used to improve Indiana's fast-charging infrastructure for electric vehicles, in order to improve Indiana's air quality and Hoosiers' health. We don't need more diesel infrastructure-it has an expiration date that is not worth investing our money in! It calls for much of the funding to go for "cleaner" diesels.

Why would we invest in old outdated technology? This technology is also bad for the environment- emitting unhealthy smog-forming gasses, fine particulate matter, and carbon dioxide.

Charging station infrastructure would enable EVs of all types to be refueled quickly and conveniently, utilizing non-polluting, cost-effective solar, wind, and other renewable electricity produced in Indiana.

Volkswagen and other vehicle manufacturers are shifting rapidly to electric propulsion. To facilitate the shift here in Indiana, IDEM should obtain a waiver
on the 15% ($6 million) limit assumed in the settlement, so Indiana can use most of its $41 million to stimulate additional private sector investment needed to grow Indiana's Fast-Charging Network along our interstate and state highways, connecting with similar fast-charging networks developing in other states.

This is smart and is needed to help continue to support a growing economy in our state. Please make a good decision about the use of these funds!

Sincerely,

Dori Chandler