



May 25, 2017

*Kendall R. Buchanan
Deputy Director, Division of Market and Consumer Services
South Carolina Department of Insurance
1201 Main Street, Suite 1000
Columbia, SC 29201*

RE: SC Draft Beneficiary Mitigation Plan – VW Settlement Agreement

Dear Ms. Buchanan:

On behalf of the Palmetto Clean Fuels Coalition (PCF), an initiative of the South Carolina Office of Regulatory Staff – Energy Office (Energy Office), we appreciate the opportunity to comment on the draft Beneficiary Mitigation Plan.

PCF is South Carolina’s designated US Department of Energy Clean Cities coalition.¹ It is a voluntary partnership of alternative fuel manufacturers, distributors, and supporters who collectively work together to increase the adoption of alternative fuels and advanced vehicle technologies. PCF strives to help public and private entities - as well as individuals - lower fuel costs, improve air quality, and reduce petroleum consumption. PCF reduced 5,826,806 gasoline gallon equivalents and 26,602 tons of greenhouse gas emissions last year alone.

South Carolina’s strong manufacturing base (especially as it relates to the automotive industry), reliance on tourism, connection to major metropolitan areas via a vast interstate network, robust port activity, and commitment to the health and well-being of its citizens and environment make it an ideal state in which to strengthen the electric vehicle (EV) infrastructure. PCF appreciates that your office supports investing in EV infrastructure and that your office is setting aside 15% for that investment.

PCF previously proposed the strategic deployment of level 2 and DC fast-charging electric vehicle supply equipment (at highly trafficked and/or visible locations in need of infrastructure to support tourism and economic development throughout the State. Since submitting our initial proposal, PCF has continued discussions with key stakeholders to include multiple ongoing efforts. These efforts have focused on state fleet management’s procurement of EVs and EV charging stations; implementation of our own *Plug in SC* EV charging station marketing campaign; a collaborative made up of EV manufacturers, SC Department of Commerce, SC Parks, Recreation and Tourism, Electric Cooperatives, and SC Department of Transportation focused on deployment along major corridors at rest areas and welcome centers; and a stakeholder group made up of the State’s investor-owned utilities and electric cooperatives. PCF’s future plans include developing an EV advisory committee that will help steer these efforts.

¹ <https://cleancities.energy.gov/>

We are encouraged by your commitment to reducing NOx emissions from class 8 school, shuttle, and transit buses. Our membership supports investments in buses that use a Department of Energy recognized alternative fuel ², thereby reducing emissions and also helping to diversify fleet vehicles, promote public/private partnerships aimed at addressing necessary fueling infrastructure, and spur economic development.

Additional information on the process that your office will use in soliciting applications or requests for proposal, as well as a potential timetable for deployment, would be helpful to everyone looking to participate. In addition, more information related to the criteria that will be used in evaluating potential proposals could be helpful. For example, will financial assistance be based solely on the estimated NOx emissions reduced or will other factors (like proximity to potential nonattainment areas) be considered as well? Knowing these factors/criteria could make the process of developing projects easier and could lead to better overall proposals.

As the statewide Clean Cities designee with a membership of more than 125 organizations, PCF is eager to help in any way necessary. Among the many ways we can help are facilitating meetings with key stakeholders; lending our expertise in the realm of alternative fuels and clean technology; conducting fleet analysis using tools like AFLEET to evaluate potential fuel alternatives; calculating NOx emission reductions; helping to leverage public/private partnerships; or promoting possible infrastructure investments using ConserFund, ConserFund Plus, or the Energy Efficiency Revolving Loan programs.

PCF supports South Carolina's efforts to move goods and people in the cleanest, most efficient, and economical means possible. We appreciate this opportunity and look forward to continuing the work already underway to reduce mobile source emissions and promote the use of alternative fuels and alternative fuel infrastructure.

Sincerely,



Maeve S.R. Mason
Co-Coordinator
Palmetto State Clean Fuel Coalition
SC Energy Office



Landon Masters
Co-Coordinator

² <https://www.afdc.energy.gov/fuels/>