NEW YORK UNIVERSITY

NYU Government Affairs
665 Broadway, 10th Floor
New York, NY 10012
212-998-2400
government.affairs@nyu.edu

Comments of New York University and NYU Langone Health

Cecil Scheib, PE, CEM, LEED AP, Chief Sustainability Officer

Paul Schwabacher, PE, MBA, Senior Vice President, Facilities Management, NYU Langone Health

Before

New Jersey Board of Public Utilities

Docket No. QO21060946

Re: Medium and Heavy Duty ("MHD") Electric Vehicle ("EV") Charging Ecosystem for New Jersey

January 24, 2023

Thank you for the opportunity to submit comments on behalf of New York University (NYU) and NYU Langone Health (NYU Langone) regarding NJBPU proposed rules to continue to find ways to increase electric vehicle ecosystems throughout New Jersey. NYU Langone was officially founded as NYU's School of Medicine in 1841 and since that time, both institutions - throughout our growth - have been deeply committed to our local communities and the regions we call home.

At NYU, we are committed to making the University one of the nation's greenest campuses and have launched renewed effort to achieve this goal. Since 2007, NYU has reduced its emissions by 30% - an amount equivalent to planting enough trees to cover all of Manhattan, and all of Brooklyn, in forest. We have pledged to achieve a 50% reduction from the baseline by 2025 and carbon neutrality by 2040. This reduction in emissions is something the University has voluntarily undertaken not only because we believe it is part of NYU's role as an anchor institution in New York but also because it positively impacts our community. We have supported the efforts of New York City and State in addressing emissions from buildings, the principal source of NYC carbon emissions, as well as other measures, including our fleet vehicles.

NYU Langone has also committed to be a carbon neutral health system by 2050 with an interim goal of 50% reduction by 2025. The health system intends to accelerate climate progress in support of its mission and in protecting the communities most vulnerable to the impacts of a changing climate. Greenhouse gasses and air pollution, such as that released by fuel combustion in vehicles, produces

smog and fine particulate matter ultimately reducing air quality and causing premature deaths. As a leading health system, NYU Langone recognizes the importance of decarbonization to improving long term health and welfare of our patients and communities. NYU Langone continues to pursue opportunities to reduce direct greenhouse gas emissions within its facilities, and to advocate for decarbonization throughout the healthcare value chain, which includes both owned and operated fleet vehicles.

While an urban university, NYU does operate a transportation fleet for our students and community members given the widespread geographical nature of our campus footprint throughout multiple boroughs in New York City. We also have a fleet that operates between NYU and NYU Langone campuses for staff and students. NYU Langone also operates several shuttles for intercampus transport and commuting. Together, we operate about 20 shuttle buses between campus properties and to mass transit, buses and vans for student athletes to attend practices and events, and safe ride and overnight shuttles for our students' safety. NYU public safety officers and operations teams also have access to a small fleet of vehicles as does NYU Langone's building operations staff. Both organization's aim is to electrify its transportation fleet completely in support of our overall carbon reduction goals. While we have been able to make the transition to electric vehicles (EVs) for some vehicles, including our public safety cars, our shuttle bus services are still diesel and diesel hybrid buses and we are hoping to transition to EVs.

Given the nature of our campuses and the density of New York City, our shuttle buses fleet are leased from and operated by an outside vendor. With our present vendor, they are parked overnight in New Jersey. While this may seem like a unique arrangement, as many colleges and universities own their fleet and are able to house their fleet on campus property, it may not be so uncommon for institutions in the very populous NYC area, where space to park, store, and charge vehicles is limited. This has presented many challenges for NYU and NYU Langone - and other urban institutions in and around Manhattan - in taking advantage of various incentives that states, municipalities and utilities may offer for transitioning fleets to EVs.

We therefore are very supportive of NJBPU efforts to broaden the array of support and incentives that are available to private entities for their transition to EVs through the proposed rules on this docket, especially as our present vendor's location is in Hoboken City, an Overburdened Municipality, adjacent to an Overburdened Community. In particular, we would look to support New Jersey's climate and

environmental justice goals by seeking participation in programs that enhance support for Make-Ready Incentives for private fleet charging depots, as well as for private fast charging sites over 500kW.

We would hope that the “stringent standards” to determine if private fleet charging depots are eligible for Make-Ready Incentives would be fair and straightforward to determine compliance. We would also hope the rules for determining fleet replacement vs additional vehicles take third party operators into account. And finally, we would hope that the required managed charging program is both accessible, cost-effective for operators, and flexible to respond over time as the grid changes - the renewable energy transition will make more resources available during the day, and fewer at night, so lock-in to a certain charging pattern would not be ideal.

Thank you for the opportunity to comment on these proposed rules and for the State’s leadership in addressing challenges to those seeking to reduce their carbon emissions by making the switch to EVs.