

The following comment was received to the RPU Board email on January 17, 2023 from the Rochester Energy Commission.

Rochester Public Utilities (RPU) Board,

The Rochester Energy Commission (EC) recommended and the Rochester City Council recently adopted new greenhouse gas emission reduction goals of 50% by 2030 and 100% by 2050. To meet these goals, the EC is recommending actions in the electrification and efficiency of the Residential/Commercial/Industrial sectors, in addition to vehicle electrification.

The provisions laid out in the PURPA 111 (d) Standards under the Infrastructure Investment and Jobs Act (IIJA) align very closely to the goals and recommendations of the EC. With that, the Rochester Energy Commission strongly recommends adopting standards for both Demand-Response and Electric Vehicle Charging.

Demand-Response Practices (A) In General – Each electric utility shall promote the use of demand-response and demand flexibility practices by commercial, residential, and industrial consumers to reduce electricity consumption during periods of unusually high demand.

Electric vehicle charging programs Each State shall consider measures to promote greater electrification of the transportation sector, including the establishment of rates that—

- (A) Promote affordable and equitable electric vehicle charging options for residential, commercial, and public electric vehicle charging infrastructure;
- (B) Improve the customer experience associated with electric vehicle charging, including by reducing charging times for light-, medium-, and heavy-duty vehicles;
- (C) Accelerate third-party investment in electric vehicle charging for light-, medium-, and heavy-duty vehicles, and
- (D) Appropriately recover the marginal costs of delivering electricity to electric vehicles and electric vehicle charging infrastructure.

The Energy Commission stands ready to collaborate with RPU on the development of practices and programs to support these standards.

Respectfully submitted,

Energy Commission

John Goetz, Commission Chair

Amanda Holloway, Commission Vice Chair