



Arkansas Environmental Support
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G. Tracy Johnson, Manager

AR-17-075

October 27, 2017

Ms. Tricia Treece
Office of Air Quality
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: Entergy Comments to ADEQ Request for Information
Arkansas Beneficiary Mitigation Plan

Dear Ms. Treece:

Entergy Services, Inc. (ESI), on behalf of Entergy Arkansas, Inc. (EAI), appreciates the opportunity to comment on the Arkansas Department of Environmental Quality (ADEQ) Request for Information (RFI) requesting input on the State's Beneficiary Mitigation Plan (BMP), as referenced in the partial Consent Decree with the United States District Court of the Northern District of California in the lawsuit entitled *In re: Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation, Case No: MDL No. 2672 CRB (JSC)*.

EAI offers comments that center around Section IV (B) regarding the Light-Duty Electric Vehicle Infrastructure Rebate Program, which would provide funding for electric (EV) charging stations across the state. EAI is highly encouraged by ADEQ's decision to allocate the maximum amount (15%) of the Emissions Mitigation Funding toward EV charging, as this investment will drive EV adoption and help reduce emissions across the State.

As EVs become more mainstream, Entergy will continue to monitor industry developments closely, assess technological trends, educate stakeholders on electric transportation and related issues, and assess potential frameworks through which we can better serve our customers. We recently launched Power Drive by Entergy (www.entergypowerdrive.com), a program through which we are incorporating electric vehicles and related infrastructure into our own fleet operations in order better to understand the costs and benefits of using electric vehicles. As part of this program, we have installed workplace charging stations in multiple locations and begun leasing vehicles for employee use. This program builds on earlier efforts that funded the installation of EV charging stations at a number of universities and community colleges. These programs, coupled with our ongoing industry research, will give us a better

understanding of the benefits and challenges associated with EVs and help us more effectively engage our customers in order to meet their evolving needs in this space.

Understanding there are a number of ways in which the State could administer the Light-Duty Electric Vehicle Infrastructure Rebate Program, EAI would welcome the opportunity to leverage its experience and work with the ADEQ to clarify the following points:

- The types of charging that are applicable (residential, commercial, or both),
- The types of chargers that are eligible, such as Level 2, Fast Charging, etc.,
- The rebate levels that are being contemplated for the different types of chargers,
- The types of entities eligible for the rebate, such as private businesses, residential customers, government entities, utilities, etc.,
- Whether the chargers need to be open to the public for personal or private commercial use,
- The plan around promotion and awareness campaigns for the rebate program that includes how the State plans to target certain entities with this program (e.g. government fleets, commercial fleets, academic institutions, multi-family housing developments, new commercial or residential developments), and
- The status of unspent funds if there is no demand for this rebate program.

If you have any questions regarding these comments, please contact me at (501) 377-4033.

Sincerely,

A handwritten signature in cursive script that reads "G. Tracy Johnson".

G. Tracy Johnson
Arkansas Environmental Support