

**Draft Beneficiary Mitigation Plan for the State of South Carolina - Summary of Written Comments Received April 10 - May 25, 2018**

*Note: The SCDOI staff attempted to concisely summarize the comments and to categorize the comments by Eligible Mitigation Action category(ies). This summary is not intended to be a complete reflection of the comments received. Interested parties should view the individual comment letters for greater detail on each stakeholder's comments.*

<b>Date of Correspondence</b>	<b>From</b>	<b>Summary of Comments</b>	<b>Eligible Mitigation Action Category(ies) [Best Fit]</b>
05/24/2018	<a href="#">Blanchard Bus Centers</a>	Replace current diesel-powered school buses w/ new propane powered buses. Use a portion of the funds for a pilot program for electric school buses. Use a portion of the funds to install electric charging infrastructure throughout the state.	2. Class 4-8 School Bus, Shuttle Bus, or Transit Bus (Eligible Buses) 9. Light Duty Zero Emission Vehicle Supply Equipment
04/10/2018	<a href="#">Blue Gas Marine, Inc.</a>	Prioritize diesel commercial marine vessels for upgrade to natural gas fuel source. Take a "bang for the buck" approach. Marine applications should be as broadly eligible as possible due to disproportionately large percentage of emissions. Invest in CNG infrastructure for on-water fueling.	4. Ferries/ Tugs
05/01/2018	<a href="#">Alan Buck</a>	EV owner that supports funding EV charging stations. Recommends adding two DC fast charging ports to rest areas located halfway between major cities and at SC Welcome Centers.	9. Light Duty Zero Emission Vehicle Supply Equipment
05/25/2018	<a href="#">Central Electric Power Cooperative, Inc. and The Electric Cooperatives of South Carolina</a>	Supports full 15% allocation to light-duty zero emission vehicle supply equipment and infrastructure.	9. Light Duty Zero Emission Vehicle Supply Equipment

**Draft Beneficiary Mitigation Plan for the State of South Carolina - Summary of Written Comments Received April 10 - May 25, 2018**

Date of Correspondence	From	Summary of Comments	Eligible Mitigation Action Category(ies) [Best Fit]
05/25/2018	<a href="#">ChargePoint</a>	Supports full 15% allocation to smart, light-duty electric vehicle charging infrastructure. Focus on Level 2 charging stations for municipalities and local points of interest. Suggest utilizing a rebate program. Make smart, networking charging features a prerequisite for EV charging funding. Allocate significant portion of remaining 85% to electric fuel projects (over other fuel types) and provide associated charging infrastructure utilizing a standard connector to increase economies of scale.	9. Light Duty Zero Emission Vehicle Supply Equipment
04/16/2018	<a href="#">City of Aiken</a>	Requests up to \$75,000 to support installation of nine Level 2 EV charging stations in/around the City of Aiken and to purchase an EV for the City's fleet pool.	9. Light Duty Zero Emission Vehicle Supply Equipment
05/16/2018	<a href="#">Clemson Area Transit</a>	Leverage the VW settlement funds for the 20% local match through the Federal Transit Administration's Low or No Emission Competitive program (Lo/No Program).	2. Class 4-8 School Bus, Shuttle Bus, or Transit Bus (Eligible Buses)
05/01/2018	<a href="#">Cummins Sales &amp; Service</a>	Supports updating engines in rail, marine and mining as a more cost effective alternative to achieve NOx emissions reductions. Recommends focusing on clean diesel and natural gas as more emission reductions can be attained per dollar spent (as compared to electric engines) based upon current technology.	3. Freight Switchers 4. Ferries/ Tugs
04/13/2018	<a href="#">Diesel Technology Forum</a>	Key outcome should be to maximize the reduction in NOx emissions. Plan should include ways to address the emissions attributable to commercial vehicles, including heavy-duty off-road vehicles such as older engines that power marine vessels and switch locomotives as well as large Class 8 trucks.	1. Class 8 Local Freight Trucks and Port Drayage Trucks (Eligible Large Trucks) 3. Freight Switchers 4. Ferries/ Tugs

**Draft Beneficiary Mitigation Plan for the State of South Carolina - Summary of Written Comments Received April 10 - May 25, 2018**

<b>Date of Correspondence</b>	<b>From</b>	<b>Summary of Comments</b>	<b>Eligible Mitigation Action Category(ies) [Best Fit]</b>
05/01/2018	<a href="#">Duke Energy</a>	Supports allocating the maximum 15% to fund installation of electric vehicle supply equipment. Supports using remaining funds to replace school, shuttle and transit buses and supports dedicated funding for electric bus replacements.	2. Class 4-8 School Bus, Shuttle Bus, or Transit Bus (Eligible Buses) 9. Light Duty Zero Emission Vehicle Supply Equipment
04/21/2018	<a href="#">Fort Sumter Tours</a>	Repower ferries used for tours of Fort Sumter with state of the art hybrid-electric technology.	4. Ferries/ Tugs
04/27/2018	<a href="#">General Motors LLC</a>	Supports full 15% allocation to electric vehicle (EV) charging stations. State should commit to developing a strategy for EV charging deployment statewide and to a corresponding investment in a charging infrastructure network. Prioritize key infrastructure needs as follows: (1) highway corridor DC fast-charging; (2) workplace charging; (3) multi-unit dwelling charging; (4) public EV charging at key destinations; and (5) urban core DC fast-charging.	9. Light Duty Zero Emission Vehicle Supply Equipment
05/25/2018	<a href="#">Greenlots</a>	Supports investment of full 15% allowable for zero emission vehicle supply equipment. Encourage focus on light-duty EV charging infrastructure rather than hydrogen fuel cell refueling equipment. Suggests early funding for EV charging and focusing on DC fast charging and Level 2 charging stations. Recommends development of a statewide EV charging infrastructure plan prior to deploying funds, funding program entities rather than individual site hosts, and requiring investments adhere to the latest open standards. Also encourages DOI to maximize funding toward transportation electrification opportunities with the remaining 85% of funds, including for Eligible Buses.	2. Class 4-8 School Bus, Shuttle Bus, or Transit Bus (Eligible Buses) 9. Light Duty Zero Emission Vehicle Supply Equipment

**Draft Beneficiary Mitigation Plan for the State of South Carolina - Summary of Written Comments Received April 10 - May 25, 2018**

<b>Date of Correspondence</b>	<b>From</b>	<b>Summary of Comments</b>	<b>Eligible Mitigation Action Category(ies) [Best Fit]</b>
05/15/2018	<a href="#">Fred Payne, Greenville County Council and Board Member of the Carolinas Alliance 4 Innovation</a>	Supports funding for zero-emission, battery-electric Eligible Buses (not buses fueled by diesel, CNG, propane or other alternative fuels) and for light duty zero emission vehicle supply equipment. Consider designating Greenville County as a sub-recipient for acquiring light duty zero emission vehicle supply equipment.	2. Class 4-8 School Bus, Shuttle Bus, or Transit Bus (Eligible Buses) 9. Light Duty Zero Emission Vehicle Supply Equipment
05/10/2018	<a href="#">The Hydrogen Association</a>	Recommends utilizing funds toward the development of a new fuel source: net-liquid hydrogen fuel.	9. Light Duty Zero Emission Vehicle Supply Equipment
05/08/2018	<a href="#">KEW Consultants</a>	Consider allocating a significant amount of funding towards freight switcher locomotive projects and consider the all-electric rail car mover as an eligible mitigation action under the Freight Switchers category.	3. Freight Switchers
05/15/2018	<a href="#">Elizabeth Kress</a>	Use funds to purchase alternative-fueled school buses (rather than new diesel buses).	2. Class 4-8 School Bus, Shuttle Bus, or Transit Bus (Eligible Buses)
05/19/2018	<a href="#">Brad Lloyd</a>	Allocate funds to new school buses.	2. Class 4-8 School Bus, Shuttle Bus, or Transit Bus (Eligible Buses)
04/25/2018	<a href="#">MedicAire, LLC</a>	Use funds for Medidocks to advance ambulance/emergency vehicle idle reduction.	10. Diesel Emission Reduction Act (DERA) Eligible Projects
04/25/2018	<a href="#">Motorcoach Association of South Carolina</a>	Consider allocating \$5 million of VW funds toward motorcoaches.	2. Class 4-8 School Bus, Shuttle Bus, or Transit Bus (Eligible Buses)
05/23/2018	<a href="#">Natural Gas Vehicles for America</a>	Natural gas vehicles (both LNG and CNG) should be prioritized as they reduce the most NOx for the least cost. State should consider a funding framework that would create parity among alternative fuel types. Suggests alternative requirements relating to scrapping/ replacing vehicles and use of Argonne National Laboratory's AFLEET or HDVEC tool to calculate emissions data.	1. Class 8 Local Freight Trucks and Port Drayage Trucks (Eligible Large Trucks) 2. Class 4-8 School Bus, Shuttle Bus, or Transit Bus (Eligible Buses) 3. Freight Switchers 6. Class 4-7 Local Freight Trucks (Medium Trucks)

**Draft Beneficiary Mitigation Plan for the State of South Carolina - Summary of Written Comments Received April 10 - May 25, 2018**

Date of Correspondence	From	Summary of Comments	Eligible Mitigation Action Category(ies) [Best Fit]
05/25/2018	<a href="#">Office of Regulatory Staff - Energy Office, Palmetto Clean Fuels Coalition; Santee Cooper; SCE&amp;G; Duke Energy; Electric Cooperatives of South Carolina; Lockhart Power; Central Electric Power Cooperative, Inc.</a>	Encourage allocating full 15% for light-duty zero emission vehicle supply equipment. PCF proposed the strategic deployment of level 2 and DC fast-charging electric vehicle supply equipment (EVSE) at strategic locations, aimed at supporting tourism and economic development throughout state. Collaboration with utility stakeholders should be an essential element of EVSE investment plans.	9. Light Duty Zero Emission Vehicle Supply Equipment
05/25/2018	<a href="#">Palmetto Clean Fuels Coalition</a>	Encourage allocating full 15% for light-duty zero emission vehicle supply equipment. Supports investments in buses that use a Dept. of Energy recognized alternative fuel. Consider using PCF to help based upon their expertise.	2. Class 4-8 School Bus, Shuttle Bus, or Transit Bus (Eligible Buses) 9. Light Duty Zero Emission Vehicle Supply Equipment
05/25/2018	<a href="#">Palmetto Railways</a>	Requests \$6 million in funds be used to support the replacement of four locomotives they are currently using in Charleston and North Charleston.	3. Freight Switchers
05/01/2018	<a href="#">Proterra</a>	Urges state to fund the purchase of zero-emission, battery-electric school buses and transit buses, not buses fueled by CNG, propane or other alternative fuels. Recommends funding 110% of the incremental cost of a new electric transit bus and associated charging infrastructure.	2. Class 4-8 School Bus, Shuttle Bus, or Transit Bus (Eligible Buses)
05/23/2018	<a href="#">SemaConnect</a>	Recommends utilizing maximum 15% allowable to fund light duty electric vehicle charging infrastructure.	9. Light Duty Zero Emission Vehicle Supply Equipment

**Draft Beneficiary Mitigation Plan for the State of South Carolina - Summary of Written Comments Received April 10 - May 25, 2018**

<b>Date of Correspondence</b>	<b>From</b>	<b>Summary of Comments</b>	<b>Eligible Mitigation Action Category(ies) [Best Fit]</b>
04/10/2018	<a href="#">Sierra Club</a>	Recommends allocating the maximum 15% allowable to electric vehicle supply equipment. Investment should target access to fast chargers on major highways and charging infrastructure in multi-unit dwellings and workplaces with a focus on disadvantaged communities. Remaining funds should be used to prioritize increasing electric truck, bus, and port equipment fleets, specifically electric transit/school buses and electric drayage and forklifts at ports. Recommends funds should not be invested in new diesel or natural gas vehicles.	<ol style="list-style-type: none"> <li>1. Class 8 Local Freight Trucks and Port Drayage Trucks (Eligible Large Trucks)</li> <li>2. Class 4-8 School Bus, Shuttle Bus, or Transit Bus (Eligible Buses)</li> <li>8. Forklifts and Port Cargo Handling Equipment</li> <li>9. Light Duty Zero Emission Vehicle Supply Equipment</li> </ol>
05/01/2018	<a href="#">South Carolina Clean Energy Business Alliance</a>	Recommends SC integrate a weighting of the economic impact into the evaluation criteria and favor grants with SC clean energy economic benefits.	Undetermined
05/15/2018	<a href="#">South Carolina Conservation Coalition</a>	Recommends allocating the maximum 15% to the acquisition, installation, operation, and maintenance of new light duty electric vehicle supply equipment.	9. Light Duty Zero Emission Vehicle Supply Equipment
05/01/2018	<a href="#">South Carolina Department of Education</a>	Use VW funds to replace oldest, most toxic school buses with mix of new diesel and alternative fueled buses. Willing to include retrofitting of current hybrid buses to serve as an electric bus pilot project.	2. Class 4-8 School Bus, Shuttle Bus, or Transit Bus (Eligible Buses)
05/23/2018	<a href="#">South Carolina Department of Health and Environmental Control</a>	Supports utilizing \$900,000 of VW funds for the state match portion for DERA federal funds over the next three-year cycle, resulting in an additional 50% bonus allocation of DERA funds.	10. Diesel Emission Reduction Act (DERA) Eligible Projects

**Draft Beneficiary Mitigation Plan for the State of South Carolina - Summary of Written Comments Received April 10 - May 25, 2018**

<b>Date of Correspondence</b>	<b>From</b>	<b>Summary of Comments</b>	<b>Eligible Mitigation Action Category(ies) [Best Fit]</b>
05/24/2018	<a href="#">South Carolina Natural Gas Vehicle Coalition</a>	Recommends that 15% of VW funds be used to offset the cost premium for natural gas vehicles purchased by public or private fleets, with a focus on medium to heavy duty vehicles.	1. Class 8 Local Freight Trucks and Port Drayage Trucks (Eligible Large Trucks) 2. Class 4-8 School Bus, Shuttle Bus, or Transit Bus (Eligible Buses) 6. Class 4-7 Local Freight Trucks (Medium Trucks)
05/01/2018	<a href="#">South Carolina Propane Gas Association</a>	The most pressing need in SC that qualifies under the VW settlement is the replacement of our aging school bus fleet. Supports replacement with propane fueled school buses and allocating the maximum funding allowable to SCDOE for purchase of propane autogas buses.	2. Class 4-8 School Bus, Shuttle Bus, or Transit Bus (Eligible Buses)
05/24/2018	<a href="#">South Carolina School Board Association</a>	Supports SCDOE proposal to use all VW funds to replace the heaviest-polluting buses with a combination of clean diesel and propane buses.	2. Class 4-8 School Bus, Shuttle Bus, or Transit Bus (Eligible Buses)
05/01/2018	<a href="#">Southern Alliance for Clean Energy</a>	Recommends that SC prioritize vehicle electrification, specifically: (1) using electric engines for any buses; and (2) maximizing the allowable 15% for light duty electric vehicle charging equipment.	2. Class 4-8 School Bus, Shuttle Bus, or Transit Bus (Eligible Buses) 9. Light Duty Zero Emission Vehicle Supply Equipment

**Draft Beneficiary Mitigation Plan for the State of South Carolina - Summary of Written Comments Received April 10 - May 25, 2018**

<b>Date of Correspondence</b>	<b>From</b>	<b>Summary of Comments</b>	<b>Eligible Mitigation Action Category(ies) [Best Fit]</b>
05/21/2018	<a href="#">Town of Blythewood</a>	Supports prioritizing ZEV supply equipment. Town wants to replace five EV charging ports (at three stations) that were installed in 2014 as manufacturer has abandoned that product line, leading to lack of maintenance, repair, and spare parts. As a part of the replacement, the Town wishes to turn over maintenance to a for-profit charging station network.	9. Light Duty Zero Emission Vehicle Supply Equipment
05/21/2018	<a href="#">Transportation Association of South Carolina</a>	Agrees that SC should support projects that reduce emissions statewide and supports BMP's focus on mobile NOx emissions. Supports focusing on leveraged funding opportunities as the majority of public transportation agencies don't have sufficient local funds to provide the local match needed to access federal/state funds for purchasing new transit buses. Believes diesel transit vehicles past their useful life need to be replaced with alternative fuel source vehicles. Requests allowing a percentage of administrative expenditures associated with implementation for fund recipients.	2. Class 4-8 School Bus, Shuttle Bus, or Transit Bus (Eligible Buses)
05/01/2018	<a href="#">U.S. Green Building Council South Carolina</a>	Supports utilizing the maximum 15% allocation for the acquisition, installation, operation, and maintenance of new light duty zero emission vehicle supply equipment. The draft BMP's proposed priority of Eligible Buses is aligned with the version of LEED designed specifically for schools.	2. Class 4-8 School Bus, Shuttle Bus, or Transit Bus (Eligible Buses) 9. Light Duty Zero Emission Vehicle Supply Equipment
06/12/2018	<a href="#">Workhorse Group Inc.</a>	Use funds to replace Class 4-6 diesel delivery vehicles with electric vehicles.	6. Class 4-7 Local Freight Trucks (Medium Trucks)