



SIERRA CLUB

NEBRASKA CHAPTER

December 27, 2017

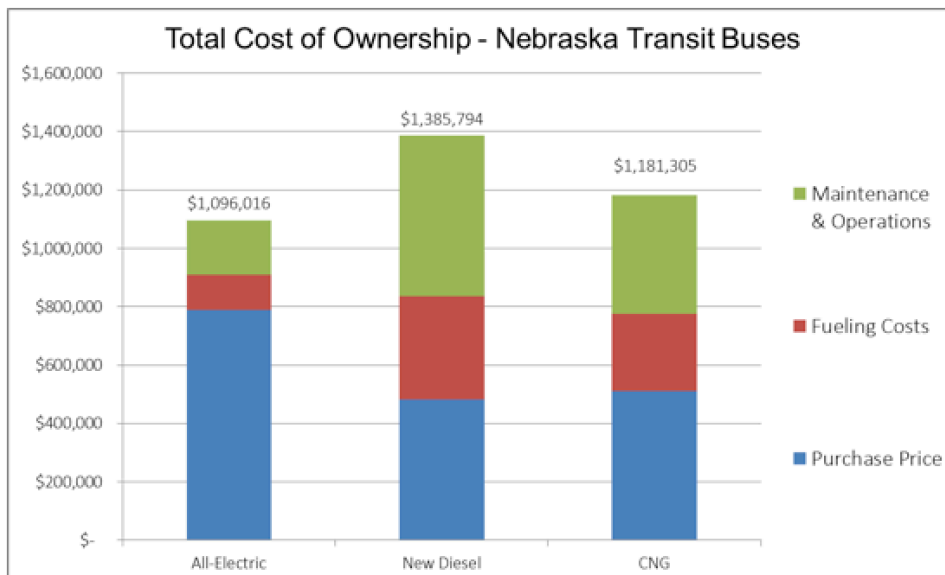
To: Nebraska Department of Environmental Quality

Thank you for the opportunity to provide public comment on your initial recommendations on the VW Settlement.

The Nebraska Sierra Club urges the NDEQ to increase the allocation for electric vehicle charging stations from the current recommendation of 10% to the maximum allowable of 15%. These charging stations should be branded and promoted. There are experts in the state that could be assembled to help determine the location and the types of charging stations that would best serve Nebraska.

In addition, at least three electric school buses with charging stations should be piloted in Omaha and Lincoln (the locations with the most VWs that were part of the settlement and with the highest air pollution). Lion Electric Company already has electric school buses, Blue Bird will have electric school buses in 2018 and Daimler in 2019.

As can be seen in the attached graph, electric vehicles are the most economical over time compared to new diesel and CNG. (*Argonne National Laboratory's AFLEET Model (2017); fuel and electricity costs adjusted for Lincoln, NE*)



Source: *Argonne National Laboratory's AFLEET Model (2017); fuel and electricity costs adjusted for Lincoln, NE.*

As auto manufacturers and other modes of transportation transition to an electric future, the VW Settlement is a unique opportunity for Nebraska to pilot this forward-looking technology. Since Lincoln seems to be best situated to the use of electric public buses, the Settlement should plan for two electric buses for Lincoln's StarTran.

As a public power state, an electric vehicle future will boost the electric options for customer/owners. Electric vehicles will be contributing to cleaner air for the lifetime of the vehicle especially in public power districts like LES and OPPD which are increasing their renewable portfolios to between 30-50%. This means that electric vehicles that are charged in these districts will be charged with 30-50% clean energy.

In the spirit of the VW Settlement, if the total lifetime costs are considered, the bus technology with the greatest NOx lb/\$ ratio is a zero-emission bus. The Settlement should focus on new electric innovations. CNG technology will not position Nebraska for a new technology future or for the cleanest air.

We commend NDEQ for limiting the administrative costs to 5% of the Settlement.

Sincerely,

A handwritten signature in cursive script, reading "David E. Corbin". The signature is written in dark ink on a light-colored background.

David E. Corbin
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