



Control Number: 49125



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PROJECT NO. 49125

REVIEW OF ISSUES RELATING §  
TO ELECTRIC VEHICLES §

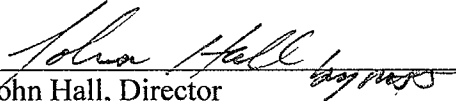
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BEFORE THE  
PUBLIC UTILITY COMMISSION  
OF TEXAS

**ERRATA TO COMMENTS OF THE ENVIRONMENTAL DEFENSE FUND**

Environmental Defense Fund of Texas, Inc. ("EDF") files this Errata to its comments filed in this proceeding on February 3, 2020. Subsequent to filing its comments, EDF realized there was an error on page 2. Attached is a corrected page 2, with the changes shown in bold and redline format for clarity.

EDF apologizes for any confusion this error may have caused.

Respectfully submitted,

  
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February 7, 2020

Electric vehicles (“EVs”) have the potential to substantially reduce emissions of carcinogens, greenhouse gases, and precursors to urban & regional ozone pollution. They virtually eliminate tailpipe emissions, which means they can eliminate emissions within polluted urban areas and thus play a pivotal role in solving many of the ozone and particulate matter challenges that the state faces. Electric vehicles charged with clean energy resources such as wind and solar power will provide even higher emission reduction benefits because the total emissions associated with vehicles include tailpipe pollution as well as those pollutants emitted in the production, transportation, and processing of oil and gas to make gasoline, diesel, CNG, and propane. EDF analyses show that tailpipe emissions account for approximately ~~a~~**two-thirds** of the total emissions associated with a typical vehicle and the remaining ~~two~~**one third** ~~is~~ ~~are~~ associated with the production, transportation, and processing of the fuels used to power them. Hence, charged wisely with clean generation resources and at times of the day when the grid is underutilized, EVs can save money for both EV users and users of the broader electric grid. For example, with controls, incentives and knowledge, EVs can be charged at night in Texas when electricity generated by clean energy resources is plentiful and electricity costs less.

Whereas many stakeholders likely will focus on light duty passenger vehicles to make the point about the environmental and economic benefits of EV adoption, in these comments, EDF offers insights pertaining to medium and heavy-duty vehicles as well. Specifically, EDF has analyzed ownership costs and emissions footprints for a variety of working electric vehicles, including transit and school buses, vans and shuttles, and short and long-haul trucks. We find that several vehicle classes and associated duty cycles are ripe for electrification by virtue of the fact that they have favorable total cost of ownership compared to their diesel and CNG counterparts,

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NOx emissions for DFW, HG and Bexar County, respectively, in the 2019 Ozone State Implementation Plan inventory.