

Public Comments

DRIVE^{EV} REBATE PROGRAM

June 28th, 2022

Driving Rhode Island to Vehicle Electrification (**DRIVE^{EV}**) will support adoption of electric vehicles (EVs) by Rhode Island residents, small-businesses, non-profits, and public sector entities.

The public comment period for **DRIVE^{EV}**'s initial draft program design was open between April 7, 2022, to May 22, 2022.

The Rhode Island Office of Energy Resources (OER) thanks the public for all feedback provided to date. We received a total of 67 comments on a variety of topics. Enclosed below is a list of all the public comments, broken down into their respective categories.

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Price Cap

1. As someone who has been interested in buying an EV for my next vehicle, I am so excited for the rollout of this rebate program! However, there are a few things I am concerned about. First, I think it would be more beneficial to more people if the new vehicle price point was increased from the \$50,000. The whole point of this rebate is to get more people to switch to electric, and people will be looking for a vehicle that matches the range and comfort of their current gas vehicle. Unfortunately, it costs more to have that reliability and range. If I want an extended range battery on a new vehicle, that can drive the price well up to \$65-75,000. I would increase the vehicle price cap to \$70,000 to encompass more options for consumers.
2. Lastly, the vehicle price cap for used EVs should increase as well. It is important to keep in mind that there are still on-going supply chain issues and used cars are currently being bought for the highest value possible right now due to demand. Especially for EVs, since they retain their value so well. I looked at costs for used EVs and even the oldest, highest mileage vehicles are still priced well above that \$30,000 mark. It would be very difficult for someone to find one below that price cap that is still reliable and not extremely old.
3. If the purpose of this program is to incentivize the purchase of electric and plug in hybrid vehicles, then setting a \$50,000 cap is a terrible mistake. People purchase electric vehicles based on the range, performance, and attractiveness of those vehicles. The vast majority of electric vehicles people will want to buy cost in excess of 50k. Some examples include the Tesla Model 3, Tesla Model Y, Ford Mach E, Kia EV6, Hyundai IONIQ 5, which all cost more than \$50,000. Limiting people to cheaper and less attractive electric vehicles won't provide the incentive I think the program should be designed for. Additionally, even for some models that may start under 50k, the trims levels that have greater range and those with all-wheel drive, very useful in our winter climate, definitely cost more than 50k. Also, federal tax credits of \$7,500 and a state rebate program of \$2,500, will make a \$50,000-\$60,000 electric vehicles affordable for more Rhode Islanders and that is the point, right?
4. Please raise the ceiling on vehicle purchase price. These cars have escalated in price & are now routinely selling over MSRP.
5. I sincerely appreciate you bringing back the electric vehicle (EV) rebate program in Rhode Island. As you are aware, driving range is one of the biggest consideration for drivers thinking of switching to BEVs. When I looked at all the various EV models currently available, a 300 mile range EV (some listed below) costs between \$50,000 and \$60,000. And some way above that. I request you to increase the purchase price limit to at least \$60,000 so that those who want to buy a longer range EV, someone like me, can also avail this rebate. Some models currently on sale with 300 mile range and priced between \$50-60k: - Ford Mustang Mach-E Extended Range - Hyundai Ioniq 5 - Kia EV6 - Tesla Model 3 Long Range.
6. These vehicles are substantially more expensive than fossil-fuel powered ones, this should be taken into consideration when establishing criteria for "qualified income-eligible applicants".
7. Another issue with the \$30K / \$50K limitation is to consider *why* someone may want to spend over that threshold. A family of 5 or 6 needs more room. If you want 6 seats, you have to spend more, easily more than these thresholds to get a good EV that fits your family or is required to do a job.

8. Another way to approach the problem is to drop to a \$2K rebate on a new EV over \$50K. Turning the rebate off like a light switch is arbitrary.
9. I believe that governmental entities need to do more to push the price of EVs to affordable levels. By setting the threshold at or below \$50,000 the rebates will be used in expensive EVs that most people who buy them do not need the rebate. To help with EV affordability, I would recommend that the rebate is set at declining scale the higher the purchase price of the vehicle is. For example, and EV costing less than \$30,000 should receive a \$3,000 rebate, one costing less than \$35,000 a \$2,000 rebate, one costing less than \$40,000 a rebate of \$1,000 and nothing after that. Why keep encouraging adoption by giving rebates to people who can afford a \$50,000 vehicle?
10. In preparation for this rebate program to be available, we have been looking at and driving EVs when available. We have found that in the state of Rhode Island, there is very little stock of EVs under 50k. Additionally, many manufacturers are now ordering 2023 models of EVs vice the 2022 models which has been about an increase in price of 2500 dollars. An increase of a purchase limit to 55k would allow for more flexibility in the cars available for purchase and rebate under this program especially moving into 2023 models for the summertime frame. General references quote the average cost of an EV as being 10k over that of a normal car. One example here:
<https://www.cnbc.com/2021/12/29/electric-vehicles-are-becoming-more-affordable-amid-spiking-gas-prices.html>
11. Please consider this part of the public feedback for the revitalized DRIVE program for electric car rebates as noted in the Providence Journal, March15, 2022. I consider myself an average guy interested in the environment, perhaps better than the next guy. I save my money, research proven technology and try to understand the best car available before putting down thousands of dollars. I used the above thoughts when I bought my 2008 Toyota Prius. FYI - I even added an aftermarket plug-in. Thus, I was one of the few plug-in hybrids in Rhode Island. After almost 14 years with the 2008 Toyota Prius it was time to upgrade my daily drive. Again, I saved my money, researched proven technology and tried to understand the best car available before putting down thousands of dollars. I recently bought a Tesla Model Y as it has the best proven technology. Also, I am pushing 75 years of age, so I ordered it with FSD. As noted in the Providence Journal, March15, 2022 article - revitalized DRIVE program for electric car rebates would cap the value of the vehicles at \$50,000 which means most Tesla's [mine]... would be excluded. I am not telling you anything new, but Tesla is really the only proven technology. Taking my Tesla with FSD out of the electric car rebate reminds me of the Seinfeld Episode with the Soup Nazi - "No Soup For You". So, rethink your cap or you will be saying to me and other Tesla owners - "No Rebate For You". Keep in mind Tesla federal tax credits went away lots of cars ago.
12. After seeing the new Drive EV program slated for sales prices on electric vehicles under \$50,000, I decided that I need to state the case that this maximum should be increased. Given that Tesla is one of the more popular EVs on the market currently, I think it is a good place to start. We can see that in the last year alone, prices have increased such that now only the Model 3 standard range would qualify for the Drive EV program. The "qualifying" vehicle for Drive EV is the RWD, standard range with entry features. I believe it is worth assuming that many Rhode Islanders would opt for the All-Wheel Drive package due to our winters and poor road conditions. That brings us up to...\$57440 as you can only get AWD along with their long range (or performance) package. This brings up my second point. Many new adopters to the EV realm (including ourselves) will likely be shopping for extended range models due to "range anxiety". I personally have a coworker who owns a VW E-Golf which has an "official" range of 186 miles. There are times in which he has to drive his wife's gas

vehicle in order to run errands or see people after a workday because he would not have the recharge time or range availability. Again, adding range increases sales price on these vehicles. I will now wrap up by referencing <https://insideevs.com/news/565883/electric-car-prices-us-20220207/> [insideevs.com which shows that as of February 2022, 2/3, of the vehicles on today's market will not qualify for Drive EV as currently planned. I propose that the maximum sales price on this rebate be increased to \$60,000. I suspect that the EV market will continue to face issues due to inflation and it would be a disservice to would-be EV buyers if you leave the maximum sales price at \$50,000.

13. It's my understanding that the maximum new vehicle price eligible to receive a \$2500 rebate is \$50,000. If the MSRP of a new EV is \$53,000 but I'm trading in a vehicle valued at \$4,000 that would make the sales price of the vehicle \$49,000. Would that vehicle qualify for the rebate?
14. OER should keep the \$50,000 MSRP cap on EVs to limit free-ridership, as recommended by the MOR-EV program analysis.

Retroactive Eligibility

15. We just purchased a Prius Prime on 2/26/22. Since the program doesn't start until the summer, will we be eligible for this electric vehicle rebate program?
16. I just bought an all-electric Hyundai Ioniq5 to be a good citizen. I think this program should be retroactive back to January 2022 to be fair.,
17. Please include electric and hybrid vehicles purchased in 2021 when there was no money left in the fund to apply for. Thanks.
18. I have purchased an Electric Car on January 14th, 2022. If the State is activating an incentive program it should include all electric cars purchased in the calendar year 2022 and going forward.
19. Great program thank you. Due to the supply chain issues, many EV buyers are on long waitlists. Can you allow purchases that come in the coming months before July to count? We had to put our order in ahead of time and can't control when the car comes in stock. My car may arrive in early June and don't want to miss this option or have to cancel my car and wait another year for the next delivery - but then you are out of funding.
20. I would hope that it is retroactive to the announcement date, as this was the impetus for me to purchase an all-electric vehicle (still waiting for it to arrive, ETA end of April)
21. It would be nice if the rebates applied to anyone who bought an EV this year, not just after the program starts in the summer, I just bought an EV last week, it's disappointing to know the program wouldn't apply the rebate to anyone who buys this this year before the program reopens again.
22. I love the program. I think that the rebate should encompass vehicles purchased or leased 1 year from the start of DriveEV. There are some drivers who would have waited for this rebate to get their electric car if they knew about the rebate. I also think it would be fair to give them a shot at the "first come, first serve" aspect of the proposal.
23. Time period: should be all of 2022 not on or after the launch date, it should be consistent with the current tax year otherwise it excludes numerous Rhode Islanders from doing exactly what you're trying to encourage.

Charging Station (EVSE) Incentives

24. Hello, thank you providing incentives to customers which absolutely helps in making decisions to stay away from fossil fuels. We have 2 points to make: - Can the state also provide incentives for installation of the special chargers required for charging EVs? - In the big picture, RI needs to work to make the price of electricity more affordable as it is in many other states. Other states also have a dual rate whereby customers pay less at night and maybe this can be considered as well. Regards.
25. I also installed a Level 2 home charger at my residence that I own. I do feel that there needs to be an incentive for homeowners to install Level 2 charging as public chargers are not ready for mass use in Rhode Island. Our State is very far behind our neighboring states when it comes to supporting Electric Vehicle Purchasing and Charging.
26. It should also include a credit, in full or in part, for the purchase of a "required" Level-2 charging station for use at the owner's RI residence address
27. The state should also invest heavily in public charging infrastructure. A rebate to businesses that include EVs in their parking lots would be a good addition. Thank you!
28. Another rebate could be full coverage of a charging station. As your electricity will be increasing and it's bad enough the electric company is allowed significant increases each time, they request them. Shouldn't they be required to reduce their energy too??!!
29. This program is well overdue and very welcome. You should also consider offering special electricity rates for charging during off-peak hours, as many other states do. Let's keep RI green!
30. Also how about bringing back support for setting up home charging stations, I believe there used to be a 30% rebate prior to 1/1/2022.

FLEET Program

31. Regarding the Fleet program- the limitation of "one application up to 5 vehicles (per 24-month period); may need some revision or clarification. Businesses or non-profit agencies may have budgets that only allow for the purchase of one vehicle at a time. I would prefer the language to restrict no more than 5 vehicles in a 24-hour period; but possibly allow for these vehicles to be purchased in a manner that does not require them to be purchased all at once. Page 22 of the document has language that has not been updated to the fleet information, but instead refers to "individual". Please update/clarify.
32. The fleet incentive should be limited to the purchase of BEVs only.
33. It is unclear from the DRIVE EV guidance document whether PHEVs are eligible receive the additional \$1,000 adder for operating in high-asthma, high-traffic communities. Regardless, the adder for BEVs should remain and the incentives for PHEVs should be eliminated.
34. OER should focus the fleet incentive to apply to new EVs only to avoid stoking greater competition for the small number of used EVs on the secondhand market.

Related to DRIVE+ Program

35. Thirdly, I appreciate the additional rebate option for lower income people. This will definitely help more people achieve access to the EV market. That being said, I think the household income threshold for this rebate should be increased as well. I know that the threshold was determined by the poverty level income and income qualifiers for state/federal aid programs. But as goods and services become more expensive, inflation continues, and wages stay the same, the lower/working class threshold consists of more and more people. In order to be considered a middle-class citizen, you would have to make between \$60-85,000 a year. This means that everyone below that level would be considered lower economic class. Just because someone isn't at the poverty level doesn't mean that they aren't struggling to pay bills or don't need extra help buying a reliable new car. I think the income thresholds should be increased.
36. Frankly, I was shocked when I started looking into buying an electric vehicle that Rhode Island currently has no incentives. As a coastal state that is very susceptible to rising sea levels, we need to have goals to reduce emissions and encouraging EV purchases should be a no brainer. My only real criticism for EV is that they are a lot of money up front with savings coming later with use, which makes it more difficult for low-income households to purchase. Incentives for all Rhode Islanders but higher incentives for low-income households should be considered.
37. But if an EV rebate program is going to move forward, it must be distributed equitably to those who need it the most. First-come, first-serve programs are inherently designed for those who have access to information about them. Although the Drive rebate is a good extra incentive for low-income people to receive the rebate, unless there is a concerted marketing and outreach effort in environmental justice communities, the people who would benefit the most from this program will almost certainly miss out on the opportunity. I encourage OER to reconsider the design of this program, and make sure these funds will both be effective at reducing carbon emissions from transportation, and get distributed to those who can least afford the cost of gas and the burden of air pollution
38. For the Drive+ rebate program to be equitable there should be income brackets allocations to the rebates, focus outreach in those cities with high asthma rates. Even though the Drive+ rebate is a good incentive for low-income residents to receive an extra rebate in addition to the Drive Eve refund, by the time that community finds out about this program there will not be enough funding for them to ever receive any of the refunds as has been in many other cases. Usually, this population are the last ones to receive this information due to lack of access to these opportunities and lack of familiarity with these programs. Therefore at least half of the funds should be allocated to those who fall under low income, accompanied by direct outreach to the high asthma cities Central Falls, Cranston, East Providence, Pawtucket, and Providence. By allocating half of the funds to low-income applicants we direct funds those most impacted by the high gas prices, on top of living in the most polluted areas in the state. By adding the Drive EV fleet refund and the Drive + rebate we can help assure the low-income community can actually afford the initial high prices & payments of these vehicles.
39. The outreach and education about these vehicles will be the toughest hurdle but it can be done by partnering with groups like the genesis center, Amos house, Progreso Latino etc...
40. E-bikes can also lower transportation costs by eliminating insurance, maintenance, and fuel costs associated with car ownership. We believe these factors will make e-bike rebates particularly appealing and accessible to low-and-moderate income households. We recommend focusing the e-

bike incentive to low-and-moderate income Rhode Islanders for this initial \$1.25 million program and encourage OER to consider expanding eligibility in the future if the e-bike incentive turns out to be popular. A future incentive could be tiered to offer different incentive values according to income.

41. A one-person household eligible for fuel assistance (i.e., with an income of less than \$33,645) is not going to be able to afford a new EV, and even the used EVs listed in Table 1 are likely to be unaffordable. The rebate values proposed, including additional DRIVE+ incentive, aren't going to make EVs cost-accessible and they won't solve the availability problem. Evidence from the CHEAPR program in Connecticut indicates that their incentive for low-and-moderate-income consumers has gone virtually unused.¹⁰
42. The Drive EV Fleet refund that now only applies to small businesses and nonprofits should also apply to low-income applicants who live in the high asthma cities.

Alternative modes of transportation (VMT Reduction)

1. Secondly, in the same realm of the eligible vehicles, I don't understand why zero-emission motorcycles would be excluded from this rebate. They are usually cheaper than the EV sedans and SUVs, achieve a good range, and are easier to park and maneuver in the city. The ZEM would be also more affordable for lower-income people who want an EV. These should be included in the rebate.
2. Please consider electric bikes to be part of the rebate program.
3. Hello, I am a Providence resident, small business owner, husband, and parent of two small children. I would like to see any tax rebate for buying an electric car be matched with a rebate for the purchase of an electric bicycle, including electric assist cargo bike. * e-bikes and cars both use electricity to get around, but an e-bike uses a lot less electricity because you can peddle and because it weighs a lot less. * e-bikes weigh twenty or more times less than a car, meaning that cars do much more damage to our roads that is expensive to maintain. * e-bikes are much safer for other people on our streets and sidewalks, cars a much more likely to kill people on our streets and sidewalks. I ask that you provide an equivalent subsidy for e-bikes as for e-cars so that people and families can make a choice that's right for them. It's only common sense.
4. As an owner of a plug-in hybrid car, I think EVs and hybrids are a smart choice for people looking to buy a new vehicle, and this program will help offset the increased cost of purchasing a battery-electric vehicle. But as a member of a single-car household in Providence, I think we should also be encouraging people to explore alternatives to car ownership. Electric bicycles (e-bikes) are a great and much more affordable option, and I think the state should be doing more to incentivize their use. Please consider adding an e-bike rebate as part of this program!
5. However, I think that to get maximum benefit from these incentives they should also be extended to e-bikes, which are a practical means of transport for many in urban areas. E-bikes require less electricity and less material usage to manufacture, meaning that they are even lower in life-cycle emissions than EVs. Also, this program should ditch the incentives for fuel cell electric vehicles (FCEVs). FCEVs are too far behind to be able to compete with EVs in the light-duty vehicle segment and incentivizing them is just a waste of money. Thank you.
6. Hello, I am very much in favor of an electric vehicle rebate, but I request it be extended to e-bikes as well. I've replaced my car with a bicycle, and I believe an e-bike would allow me to make the replacement permanent. This helps the environment, congestion, parking, and puts less strain on

our electric grid than a full car. But e-bikes are expensive, and it would be easier for me and many other people to replace their cars with e-bikes if there were a rebate for them just like their larger counterparts (which still contribute to congestion, parking, and use an order of magnitude more electricity).

7. I strongly urge you to include at least a \$900 rebate on e-bikes within this program. While encouraging people to shift to electric cars will help reduce GHG emissions, encouraging people to use electric bikes promises even better outcomes for our communities as we seek to encourage shift to more sustainable modes of transportation such as biking and walking and meet the goals established by the Act on Climate legislation.
8. Instead, the funds should be used for (b) providing some rebates for electric bicycles; and (c) providing transit passes to state employees in the State House area and those who work in public colleges - CCRI, RIC, URI, where there is good bus service. Here's why: 1 Reports are that new cars are in short supply, so there is no need for taxpayer rebates to sell what EVs are available; 2 only relatively affluent households can afford a new car, assistance should be better targeted for less affluent households; 3 EV drivers are already getting a break, some from Federal subsidies and all from not having to pay for the roads they use since they do not pay any gas tax or equivalent; 4 though better than gas cars, EVs are still a car - they need roads and parking, they add to congestion, to accidents that kill or injure people, pets, and wildlife, they promote sprawl which is contrary to our land use goals, they contribute to pollution from tires, they deter biking and walking, transportation choices which have much lower carbon emissions - for all these reasons the approved State Transportation Improvement Program (STIP) has a goal of reducing vehicle miles travelled, subsidizing car purchases undermines this goal; 5 an electric bicycle is a much more widely affordable and can save even middle income households the expense of a second car - and an estimate of their life-cycle carbon emissions is only 16.1 gms of C per passenger-km, in comparison an EV is 92, a gas car 208; 6 similarly its estimated a local bus emits 58 gm of C per psgr-km and it is about 28 times safer to be in a bus than in a car - thus there is good reason to help implement RIGL 36-6-21.1 that requires the state to try to reduce state employee commuting miles and the offering of a transit pass as an alternative - especially practical as after covid there is plenty of capacity on the buses. Thank you for considering these ideas.
9. This small amount of funding would likely go a much longer way in reducing carbon emissions from transportation if it were used for (b) providing rebates for electric bicycles which cost much less than electric vehicles (c) providing transit passes to state employees in the State House area and those who work in public colleges - CCRI, RIC, URI, where there is good bus service.
10. Offering an e-bike incentive will demonstrate a clear commitment to active mobility as a carbon reduction strategy. The Act On Climate mandate, which requires the State to reach net-zero by 2050, is based on emissions reductions required to stay within 1.5 deg C of warming. Although vehicle electrification is extremely important, staying within 1.5 deg C of warming is more difficult if we do not reduce vehicle miles traveled (VMT). An incentive of \$900 for the purchase of a new e-bike would establish the importance of VMT reduction alongside electrification as primary strategies to clean up the transportation sector in Rhode Island.
11. The idea of e-bikes as a low-carbon transportation option is gaining traction across the country. President Biden's Build Back Better Plan includes a proposal for an e-bike rebate; California offered e-bike rebates to low-income residents as part of its CleanCars4All program; Massachusetts committed \$3 million to e-bike pilot programs in communities across the state; the Connecticut Senate recently passed the "Clean Air Act," a bill that commits to offering e-bike incentives

alongside EV incentives; and Green Mountain Power, a utility in Vermont, offers e-bike incentives to customers who want to displace gasoline consumption. An incentive value of \$900 aligns with the tax credit the Build Back Better plan proposes.

12. OER should expand the offering for low-and-moderate income consumers to include an incentive for the purchase of a new e-bike. An e-bike can be a low-cost mobility alternative to car, especially for households that cannot afford any car at all. The incentive to purchase an e-bike could help replace a polluting and expensive gas-powered car in a LMI household struggling with the maintenance, fuel, insurance, and repair costs of car ownership.

Transparency

1. The document doesn't indicate when the program start date will be, however it makes it clear that purchases prior to the start date will not be eligible for this program. I feel strong that the "start date" should be either the date the program was announced or backdated to 1/1/2022. Lots of media around this program, people who need to commit to a vehicle and saw the program will consider an EV (the whole point of the program!) but then to not be eligible is unfair.
2. What are the requirements for individual city rebates? "May be available" is not reliable for purchasing decisions.
3. Thank you for your time considering my feedback. I'm very passionate about preserving our delicate climate. EVs are a good place we can all help. I'd like to address a concern I have with the program guidance that I believe will detract from the clear goal of reducing our reliance on fossil fuels. The language regarding rebate participants to acquire a vehicle from a "licensed Rhode Island Automobile Dealer" is an obvious bias against the Tesla manufacturer and any other future manufacturer choosing to sell vehicles direct to consumer. I purchased a Tesla online last year (delivered to the East Greenwich facility) and have found this sales approach ideal to traditional purchases. This proposed language is clearly a means to isolate benefits to dealerships rather than provide a full and open benefit to any end customer. Please create a more full and open benefit to give citizens a choice. Thank you and I look forward to seeing the rebate program provide benefits once again for Rhode Islanders.
4. I am looking for an application, I expect my new all electric car will be in by June 2, 2022. Please send me an application, I could not find it on the website.
5. I'm thinking about purchasing a BEV. In order to qualify for the \$2,500 rebate, it looks like I shouldn't actually purchase the car until this DRIVE EV program is officially launched. Am I correct? When do you expect applications will be available?
6. This is a comment from the Rhode Island Automobile Dealers Association. Footnotes 5, 7, 15 & 17 refer to the purchase price cap of either \$50,000 for new vehicle or \$30,000 for used vehicle "which is set by the manufacturer" and excludes "destination or delivery charges", "floor mats, first aid kits, cargo nets, etc." This is unclear. In practice the purchase price is the price agreed to by the consumer and the dealer and includes any options such as floor mats, cargo nets, first aid kits, etc. Also, destination or delivery charges are included in the price. The manufacturer provides the Manufacturer Suggest Retail Price (MSRP) for all new vehicles, however the MSRP is a reference and not necessarily the negotiated and final purchase price. There is no MSRP on used vehicles. The footnotes 5, 7, 15 & 17 suggest that the purchase price is determined by the manufacturer which is confusing.

7. A report of who received these vehicles from the last EV rebate program should inform who received these vehicles last year: what zip codes benefited? What income levels received them? In addition to informing this new roll out a report of who received these refunds should be reported to the public.
8. One of the required documents to apply for a rebate is a W-9 form. It is not clear why submitting a W-9 form is a requirement, as it is not required to receive a MOR-EV rebate in Massachusetts. If possible, OER should eliminate this requirement to make it easier to apply.
9. The program guidance document says it is possible to “pre-qualify” for a rebate before the vehicle purchase. It is unclear whether pre-qualification is intended to act as a “point of sale” option, as the program guidance document states that processing each application will take 4-6 weeks. OER should clarify whether the pre-qualification option will effectively act as a point-of-sale rebate. If not, OER consider a point-of-sale option in the future.
10. We are concerned that requiring a signed W-9 form will erect an unnecessary barrier to Program participation. It is unclear why the W-9 form is needed and what value it adds to the Program. We recommend that this requirement be removed.

EV Market Availability/Accessibility Issues

1. From the proposal--- Purchase or lease date must be on or after (insert launch date). Applicants will then have ninety (90) days to provide OER with all required supporting documentation. Right now, it is extremely difficult to purchase some PHEVs and EVs in Rhode Island. We tried to purchase a Rav4 prime and was told the wait time was 8 to 12 months. We tried to purchase a Tucson plug-in. Salesman told me he took a deposit, but purchaser will not be getting their car before October 2022 at the earliest. They are no longer taking deposits. If this is an incentive program it does not need to be. If this is a rewards program who gets rewarded? People who were lucky enough to have been put on a waitlist and take possession of their car "just at the right time".
2. How can I view the list of included vehicles? Inventory is in very short supply & program fund availability may time out before cars are available without advance planning. I am looking for a car right now & seeing that list would guide my research & decision-making.
3. How will supply chain issues affect the ability to apply for this program? For example, I have submitted a down payment over a year ago for an EV, but the production is taking forever. Can I submit a proof of down payment to lock in my spot for an incentive and take advantage of the incentive upon delivery of the vehicle? My concern is that the 1.25 million will run dry while I am still waiting despite committing financially already.
4. Eligibility: New vehicle eligibility should not be limited to purchase from RI Auto dealers only. Due to the demand/limited inventory for these vehicles many people myself included had to go to nearby MA or other states to purchase the vehicle. The vehicle should be registered in RI and RI taxes paid. If you don't do this, you are severely limiting the effectiveness of this program. EV and PHEV vehicles are extremely hard to find. If the objective is to encourage their ownership in RI these requirements need to be adjusted.
5. Please make the rebate permissible for cars bought in MA. Often, they offer much better prices than the RI dealers. Even with a rebate - probably better off buying from a bigger player in MA - which by the way is much closer for me in Cumberland.

6. I do not think is money well spent. Electric cars have been sold out with wait times exceeding a year in some cases. In this current environment, the money will be wasted as it will not increase sales. Save the money for next year when there may be some supply of vehicles.
7. Hello, we are very interested in buying a used electric vehicle to replace my gas vehicle, and we have been waiting for an incentive to make this a reality. But the fact that there is now a stipulation in there about it having to be purchased at a RI dealership makes it all the more meaningless. There are so few EV's available right now that it is virtually impossible to find one that is remotely affordable at a dealership. In order to afford one, I'd have to go to a private party, and almost certainly in another state. The lack of flexibility with the rebate is so frustrating - do we want to encourage EV ownership in RI or not? Make it easier, not harder!

Incentive Price Increase

1. "Up to \$2,500"?!? That is simply shameful! The latest IPCC report tells us we have no more than 3 years to try to offset the worst of climate change. 3 YEARS!!! Do you really think that \$2,500 is going to push people to go electric??? What happened to the \$7,500?!? It should be at least \$10,000 considering manufacturers already jack up the price on EV's to start. We NEED drastic change NOW and "up to \$2,500 is not even enticing. Politicians will not budget for it because voters are not pushing for it. Voters are not pushing for it because they are not well informed and do not understand the gravity and urgency of the situation. Hence, the population needs to be coerced into going green. So why not make it more appealing???? OFFER - MORE - MONEY! Otherwise, we are doomed.... 3 years...
2. Although 2500.00 is a nice gesture, the cost of electric vehicles is out of reach for the average citizen.
3. Consider SALES Tax. Going from a gas car to an EV takes you to 0 emissions and from 17MPG to 90eMPG. To accomplish this, a \$50K EV comes with a \$3.5K sales tax. For \$100K, its \$7.5K sales tax. Cut the sales tax! It's a huge disincentive.
4. So, to look at this differently. Consider the \$2.5K rebate as being as much as a 10% discount, considering entry price for EVs is, at lowest, \$25K. As the price of the car increases (that's the consumer choice), the \$2.5K is a smaller and smaller percentage of the whole. It is 5% of \$50K and just 2.5% of \$100K.
5. Increase the incentive amount and publicize the advantages of owning an electric vehicle.
6. My comment is not original and is based on a podcast I heard. (Volts podcast: Matthew Metz & Janelle London on gasoline superusers & smarter EV subsidies. Link: <https://podcasts.apple.com/us/podcast/volts-podcast-matthew-metz-janelle-london-on-gasoline/id1548554104?i=1000556206674>) The brilliance of the idea is the simplicity. In order to calculate your rebate when you trade in your car you need to know how many miles you drove it (odometer), how long you owned it (title) and MPG (internet). If you own a gas guzzler and you drive it a lot, you get a bigger rebate. If your previous car was an EV, you get no (or much less of a) rebate. Not only would this approach statistically remove more CO2 from the atmosphere, but it also tends to skew towards people of lower income levels. Please listen to the podcast! Also, feel free to contact me to discuss further. Thanks!
7. As a long-term Hybrid car driver, I do not understand why this program should be offering tax incentives to hybrid vehicles. Although I certainly had better mileage in my hybrid, I still consumed

mostly fossil fuel. Climate change would be better served with a higher tax credit for EV's, to encourage people to make the change to what is usually a more expensive vehicle.

Used EVs

1. When the list of eligible vehicles is created; I am wondering if there will be restrictions on the age or mileage of the used vehicle purchase.
2. Discriminating on New and Used values at \$50K and \$30K hints at discrimination against one manufacturer as a favor to car dealers, and it unfairly and anti-competitively constricts consumer choice. One example: a 6-year-old Model X could have a resale value around \$45K to \$55K. With a \$30K used car limit, do you really want to hamstring a buyer from stretching to afford or simply select this EV?
3. The secondhand car market is currently a sellers' market and, as a result, even used EVs are out of many buyers' price range. Used prices are 40% higher than they were a year ago for all cars. By comparison, new car prices have only increased by 9%.⁷ The extraordinarily high prices for used cars are unlikely to be resolved in 2022. ⁸ New EVs also still have the advantage of the federal tax credit (up to \$7,500, depending on the EV model), which makes some new EVs comparable in price to used EVs.
4. The used EV program design is not appropriate for the current conditions of the secondhand car market and the limited supply of used EVs in Rhode Island and regionally. OER should not expect the used EV incentive to be well-utilized, though an incentive for used cars will be valuable in a few years when there are more EVs in circulation.

Point of Sale

1. I do have a concern about the process that would require recipients of the incentive to wait 4-6 weeks to receive the rebate return. Is there some way that this can be processed at the Point of Sale through the dealer? My concern, particularly for those that qualify for the low-income additions, that the need to pay the amount up front and then wait for a rebate check would deter too many from participating in the program. With the federal rebate, dealers can incorporate the rebate into the payment at the Point of Sale. This simplifies the process for buyers and also removes the need for purchasers to come up with additional cash up front. I would really like to see this process work more directly with the dealers than the buyers.
2. Point-of-sale rebates (incentives offered at the time of vehicle purchase) better alleviate upfront costs and make incentives more accessible to LMI drivers.
3. The Program Guidance Document contemplates a rebate program. While rebate programs are successful in driving EV sales, point-of-sale programs remove the additional step of submitting information for the rebate and waiting for the rebate to be issued. If it is not administratively burdensome and does not delay program implementation, we suggest that the program be structured to allow for point-of-sale incentives. This provides a smoother experience for prospective zero-emission vehicle owners and promotes equity by removing a barrier for many low- and moderate-income participants who are unable to carry the additional cost until the rebate is issued. Researchers have found that point-of-sale incentives can contribute to a more equitable EV market.

Pro-active Outreach

1. If possible, maintain a list of e-mail addresses to be notified of finalized guidance.

Program Funding

1. I have leased an EV and bought two plug-in hybrids. These incentives mean a lot to people as they make this decision. As we shift away from fossil fuels, as we must very quickly, we need to help people with the extra upfront costs of EVs. We need adequate funding to keep these incentives going all year, every year, not run out in April of Year One. Thanks.
2. Finally, there is a matter of a gas tax. A gas tax is a perfect tax on carbon and encourages better MPG across the board or encourages gas car and truck drivers to move to Electric which has better eMPG and no gas. A gas tax can fund this program, easily.
3. The rebate program needs to be for a XO period of time, not just once. The EV's are costly. Having a multiyear rebate for the equivalent of taxes for four years would be helpful to the buyer. And encourage people to purchase the vehicle.
4. As we desire to support a green environment and move toward full and continued electrification, consideration should be given to extend the incentive annually based on the current registration of a plug-in vehicle.
5. OER should plan to identify funds to offer a consistent rebate through at least 2027, when experts believe EVs will reach cost parity with new gas-powered cars.² Consistency is key; rebates offered without interruption inspire greater consumer confidence in EVs.
6. To spend the limited \$1.25 million dollars cost-effectively to reduce emissions, the \$1,500 incentive for new PHEVs should be eliminated.
7. For a future round of funding, OER should offer two distinct programs with two pots of money for individuals and fleets. It would be a shame if most of the program funding was immediately gobbled up by well-resourced fleet operators buying vehicles five at a time in this round, leaving nothing for individual Rhode Islanders, or vice versa. The mix of applications in this pilot program should be used to assess demand and size separate individual and fleet EV incentive programs in the future.
8. Both new and used fully electric vehicles, as well as plug-in hybrid electric vehicles, are eligible for the Program. NECEC is highly supportive of the proposal to allow used vehicles to qualify. However, given the urgent need to begin transitioning to a fully decarbonized transportation system now, plug-in hybrid vehicles should not be eligible for the rebate.² This will ensure that the funds for the DRIVE EV Program deliver the greatest emissions reduction benefit possible.

Support for EV Incentive Program

1. As a Providence resident and concerned climate constituent, I completely support the proposed DRIVE Rebate Program. As our planet trudges ever closer to a climate permanently changed by humans, we must do everything in our power to offset this devastation. This is an excellent first step to change consumer behavior within our small but mighty state.
2. I am looking to buy an EV, and this rebate would make the difference for me to do it. I feel it is imperative that Rhode Island help increase the number of electric vehicles (and electrify the grid) and retire cars that are contributing to emissions.
3. Electric vehicles are the future, excellent program for us as small businesses.
4. As someone who works in clean energy and has studied vehicle electrification as a means of decarbonization, I am very much in support of implementing the DRIVE rebate program in Rhode

Island. I support the cap on the cost of the vehicle (\$30,000), the incentives for used vehicles, and other aspects of this program.

5. Green Energy Consumers Alliance strongly supports OER's efforts to re-establish the EV incentive program and we are generally supportive of the program design.
6. NECEC applauds OER for opening the DRIVE EV Program, which will accelerate zero-emissions vehicle deployment in the state.

Against EV Incentive Program

1. Why is the OER failing to take into account the Day 1 carbon offset of producing an electric vehicle. While agreement throughout the life of the car carbon produced is less than a gasoline engine. To produce the all-electric vehicle vs the gasoline vehicle is grossly ignored for taking account all the carbon. What will happen upon disposal of the vehicles? I think there is a carbon offset that should be figured in to dispose of the electric vehicle as well. All electric vehicles do not get us to the climate change initiative. A hybrid of gas and electric should be given the top dollar in incentives if you truly want to offset carbon. All electric is only making people feel good at the top. Most electricity is produced from a carbon source; so you are transferring the carbon footprint from the individual consumer to the utility of choice. It is a pipe dream by 2030 that we can move all electricity from carbon burning generators to solar and wind. When the wind doesn't blow, and sun doesn't shine an alternative needs to be invented to store the energy. Battery storage technology is growing but again it is highly carbon dependent to produce and dispose of these large batteries. Stop wasting our tax dollars on this pipe dream. Everyone is ignoring the fact that we are clear cutting forests to put in these large solar fields. Where does that go into the equation of carbon offset. The actual filters of CO2 are being cut down at alarming rates around the RI to install these panels. That cannot be good for the environment.
2. I believe the idea of giving large rebates to a small number of people buying EVs is the wrong approach and should be reconsidered.
3. As a driver with an old car that I would love to replace with an EV, I am excited that this rebate program is happening. However, I fear that overall, the program is much too small to make a real difference in the amount of EVs it will encourage people to buy.