



December 20, 2017
17-EA-258

Via electronic submittal

Nebraska Department of Environmental Quality
Air Quality Division, Attn. Randy Smith
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(402) 471-2186

Subject: OPPD Comment's on the Draft Mitigation Plan for Nebraska's portion of funds from the Volkswagen Environmental Mitigation Trust (VW Trust)

Dear Mr. Smith:

Omaha Public Power District (OPPD) is a publicly-owned electric utility that serves a population of approximately 810,000 people in Nebraska. OPPD is governed by an elected board of eight directors. Headquartered in Omaha, Nebraska, OPPD is a self-supporting subdivision of state government. All revenue for operating expenses and routine improvements and additions is acquired by OPPD through the sale of electricity and related services. OPPD owns and operates its own generation, transmission and distribution facilities, serving more than 360,000 customers in 13 southeast counties. Funds for major construction expenditures come from the sale of revenue bonds on the private bond market. OPPD receives no tax income and has no taxation power.

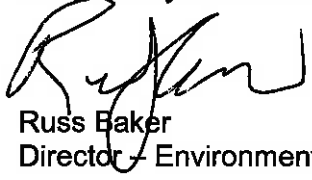
OPPD is providing comments on the Draft Mitigation Plan for Nebraska's portion of funds from the Volkswagen Environmental Mitigation Trust (VW Trust).

As indicated in our comment letter submitted on November 1, 2017, (OPPD Record Number 17-EA-228) OPPD supports and would again like to encourage the Nebraska Department of Environmental Quality (NDEQ) to use the maximum allowable of 15 percent to support light duty zero-emission vehicle charging infrastructure. We believe, and other entities in Nebraska also believe, that efforts should focus on Electric Vehicle Supply Equipment (ESVE) due to the maturity levels of the technologies and the future direction of the vehicle market. Many traditional vehicle Original Equipment Manufacturer (OEM) including, but not limited to, Volkswagen, GM, Ford, Volvo, Mazda, Toyota and Nissan have announced plans to either significantly increase the number of EV models offered or move towards an EV-only future. Battery costs have significantly declined in recent years and are projected to make the total cost of ownership of EVs less than internal combustion engines in the next 5 to 10 years.

Research has shown that one of the major barriers to EV adoption is a lack of available public charging infrastructure. The Mitigation Trust fund is a great opportunity for Nebraska to get a jumpstart toward providing the necessary infrastructure to meet the needs of an EV future for Nebraska.

If you have any questions concerning the contents of this submittal, please contact me at (402) 636-2316.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Russ Baker". The signature is fluid and cursive, with a large initial "R" and a long, sweeping underline.

Russ Baker
Director - Environmental and Regulatory Affairs