



July 12, 2017

Mary D. Nichols
California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

Re: Support for rapid consideration and quick approval of the Cycle 1 CA ZEV Investment Plan

Dear Chair Nichols:

EV Connect, a California-based, leading provider of EV charging and management solutions supporting the entire electric vehicle ecosystem, supports Electrify America's California Zero Emission Vehicle Investment Plan and strongly urges CARB to approve it as soon as possible.

EV Connect is a total solutions provider to the rapidly growing and evolving electric vehicle charging and management industry. The Company's turn-key solution includes:

- Host site assessment and acquisition
- Charge station evaluation and selection
- Installation design and coordination, including host feature configuration and set-up (e.g., access controls, pricing, etc.)
- Station activation and operations management, including command & control functionality
- Driver and site host support
- Maintenance and station repair
- Electricity load management
- Electric utility Demand Response (DR) interface and capability

Within the United States market, EV Connect delivers customer-tailored programs leveraging our open and flexible platform with industry leading service. We are 100% charge station agnostic, so long as the stations comply with the industry's open-source protocol. EV Connect brought these internationally recognized open charging standards (i.e., OCPP) to the U.S. market with the launch of its EV Cloud™ platform almost six years ago. Since its product launch, we have been singularly focused on building robust and flexible software solutions which provide the best user, host and utility experiences in the market. In addition, unlike some in the

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industry, EV Connect does not manufacture or OEM its own charge station hardware. We are the leading U.S.-based open standards management software provider and have integrated with leading charge station manufacturers, including GE, ABB, EV-Box, BTCPower, and Efacec.

By way of this letter, EV Connect wishes to register our support for expeditious implementation of Electrify America's CA ZEV investment plan. Our support is similar to a letter you received from several California EV charging services companies (see Appendix). In response to your May 24th letter requesting clarification, Electrify America has supplemented its investment plan. As such, we would like to take this opportunity to comment on the Plan, as supplemented, and reinforce our strong belief that these investments are critical to California meeting its EV deployment goals and will bring needed investment to communities across the State. We hope you will allow the process to move forward quickly.

EV Connect supports Electrify America's California Zero Emission Vehicle Investment Plan and its supplement because it encourages growth in the EV marketplace by removing infrastructure barriers and supports technology-neutral solutions.

Specifically, this Plan recognizes that:

- Supporting infrastructure is likely to be the biggest barrier to California reaching its goal 1.5 million ZEVs on the road by 2025. Thus, helping the State reduce its dependence on foreign oil, and helping consumers save money at the pump, while dramatically reducing smog and greenhouse gas emissions that endanger the health and welfare of Californians.
- The \$800 million being spent is not enough to meet all the needs, but is a substantial down payment that will encourage further investment and set the State on course for generating thousands of new jobs. The EV America investment alone is estimated to support up to 8,500 jobs over the 10 year course of the investment.
- A technology-neutral solution is in the best interests of consumer choice and continues to encourage future innovation within the industry. It would be a serious long-term mistake to select a proprietary "closed" platform which would stifle choice and innovation.
- Access to electric vehicles, encouraged by local infrastructure which this Plan supports, within the moderate to low income communities is essential if *all* Californians are able to participate in this evolving transportation paradigm.

EV Connect has been and remains committed to the democratization of this evolving EV transportation modality. As a very active participant in other programs, such as those sponsored by the independently-owned electric utilities within the State, we have focused

considerable attention and energy into market segments, such as multi-unit dwellings, which broaden access to electric vehicles.

EV Connect is particularly encouraged by CARB's request and interest from the State Legislature which helped focus Electrify America's efforts in its supplement to make investments that supply a much needed benefit to all Californians, including low and moderate income residents, and those who live in disadvantaged communities. As a private company operating in this sector, we certainly understand that there needs to be a business case for all investments, but we were pleased to see the Supplement recognize that there is a business case for a substantial investment in those communities and we are committed to help work with EA to find opportunities to invest in low and moderate income communities.

In addition, EV Connect is particularly pleased that Electrify America added the Fresno metro area as a focus for community charging investments, developed an education and outreach proposal targeted at the unique barriers to ZEV use in low-income and disadvantaged communities, and presented a new strategy to explore the use of more affordable pre-owned ZEVs. Lastly, we support Electrify America's investment in Sacramento and the CARB priority communities there as part of Electrify America's Green City Initiative.

It is imperative that California expeditiously finalize its decision regarding the EA Plan. California is in danger of falling behind other States because EPA has already approved EA's investment plan and EA is already deploying in other states, e.g., Maryland, Virginia and the District of Columbia. Given that California has the largest number of electric vehicles on the road today, it would be unfortunate at-best, and irresponsible at-worst, if the State was not at the forefront in establishing a well-considered and described plan for access to EVs and their supporting infrastructure for *all* Californians.

On a global basis, other countries are making substantial investments and pushing policies intended to lure EV producers to prioritize their markets. Given the size of the California market, which rivals most countries, the need for comprehensive plans and policies is essential. Automotive OEMs have to prioritize their actions, spending and planning for their biggest markets. Market leaders have been in California to-date because the State has been aggressively leading the pack with policy and investments. However, other states, and countries, are making EV adoption and supporting infrastructure deployment a priority. California should not risk falling behind.

EV Connect supports the expeditious approval of the Electrify America plan, as supplemented, because we firmly believe it is in the best interest of California's environment, economy, and

people in disadvantaged communities across the State. We also support the Electrify America Plan because it will be good for EV Connect's growing business, and supports our mission to promote and support EV adoption for all geographic, economic and societal demographics.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jordan Ramer', with a stylized, cursive script.

Jordan Ramer
Chief Executive Officer
EV Connect, Inc.

APPENDIX



April 11, 2017

Mary D. Nichols
California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

Dear Chair Nichols,

The Volkswagen (VW) settlement decree represents a unique opportunity to accelerate the electric vehicle (EV) market in California. Expanding this market will create jobs and new economic opportunity, help California achieve its climate mitigation goals, and protect the health of disadvantaged communities who face the worst effects of tailpipe pollution. We urge CARB and the other parties to implement the requirements of the existing settlement as soon as possible.

This letter is signed by companies representing the full breadth of the EV charging industry, including EV Supply Equipment (EVSE) manufacturers, installers, technology providers, and users. We are concerned that the full perspective of the EV charging industry has not been well communicated to policy makers and other stakeholders so far on this issue. Our companies are committed to competition and understand how the California ZEV Investment Plan, as it is currently written, will be beneficial to the public and the industry.

As you know, Appendix C of the settlement decree establishes the California ZEV Investment Plan, which requires VW to invest \$800 million in California over the next ten years. We applaud CARB for securing this requirement as part of the settlement agreement. Along with the rest of the settlement, we believe that Appendix C is an effective mechanism to hold VW accountable for its actions, while also achieving important public benefits.

In particular, we believe the provisions of the existing settlement have the following benefits:

- **Enables California's Transportation Policy Goals:** Many of California's landmark transportation policies (tailpipe emissions standards, the ZEV mandate, and the LCFS) require or benefit from expanded deployment of EVs and other ZEVs. That need is reflected in California's current target to put 1.5 million ZEVs on the road by 2025. The VW settlement will help enable all of these policies by expanding access to public charging to reduce range anxiety at a critical point when many mass-market EVs are starting to enter the market. By enabling California's transportation policy framework, the settlement will help deliver broader consumer and public health benefits for all California residents.
- **Requires Broad Geographic Deployment:** The settlement requires VW to make investments across a variety of cities, metro areas, and types of locations, such as workplace, multi-family, and other public locations. This will ensure maximum access for existing and future EV drivers, including high speed charging on highways and public chargers in workplaces, multi-family dwellings, and community settings, such as grocery stores and shopping malls.
- **Expands Access to Public Charging Infrastructure:** VW has stated its commitment to installing public DC-fast charging and Level II charging as part of the ZEV Investment Commitment. Range-anxiety is still a major adoption barrier for consumers and expanding public charging infrastructure is a critical step to addressing this concern. Further, the settlement specifically prohibits eligible investments at or adjacent to VW dealerships.
- **Supports Disadvantaged and Low-Income Communities:** In addition to requiring a broad geographic and site distribution (e.g. multi-unit housing) of charging infrastructure, the settlement directs VW to make investments that will benefit disadvantaged communities in two ways. First, it encourages EV charging infrastructure for heavy-duty trucks, freight transport and transit, which are a major source of diesel air pollution that disproportionately affects disadvantaged communities. Second, it encourages wider access to EVs by directing investments at programs that increase public access to ZEVs through car-sharing, ride-hailing services and other mechanisms to allow low-income customers to acquire a ZEV.
- **Creates Jobs:** The California ZEV Investment Plan will result in exponential expansion of electric vehicle infrastructure well beyond the existing approved deployments. This will create good-paying jobs throughout California in construction, electric utilities, system installation, system operations, and maintenance.
- **Ensures Appropriate State Oversight of VW's Investment Plans:** Under the terms of the settlement decree, CARB must review VW's 30-month investment plans. It then has the discretion to approve or disapprove specific elements of the plan to ensure

compliance with the requirements of the settlement decree. This ensures that the State will have an appropriate oversight role while still providing the market certainty and efficiency necessary for market participants to support these investments.

- **Requires Technology-Neutral, Non-Proprietary Standards:** The settlement requires VW to install EV charging infrastructure that supports multiple, non-proprietary connectors, open network communication protocols, and charging protocols that anticipate the evolving field of EV charging. As an example, VW has stated that it will support all broadly accepted standards for Level II and DC-fast charging. This includes supporting CHAdeMO DC-fast charging connectors, even though VW does not plan to support CHAdeMO in its own vehicles.
- **Preserves Fair Competition:** VW has stated that it will work with multiple, qualified vendors to achieve the requirements of the California ZEV Investment Plan and it will make those decisions based on competitive processes.

California has always been a global leader in moving the automotive market towards a cleaner, more efficient future. The VW settlement represents another unique moment for California to push forward and jumpstart broad adoption of EVs and other ZEVs. We are concerned that some have raised objections and proposed delays to implementing the settlement. We firmly believe that our state, our industry, and our planet, cannot afford any unnecessary delay and we urge you to move forward as quickly as possible under the existing terms of Appendix C and require VW to fulfill its obligations under the current California ZEV Investment Plan.

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Greenlots

Frank Meza
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