

February 28, 2022

RE: California Air Resources Board (CARB) Electric Vehicle Supply Equipment (EVSE) Technology Review

California Air Resources Board Staff:

Thank you for the opportunity to provide comments on the EVSE Technology Review.

Founded in 2009, Rivian Automotive, LLC (“Rivian”) is an American manufacturer of all-electric adventure vehicles™ with headquarters in California. It is Rivian’s mission to Keep the World Adventurous Forever. Displacing the heaviest polluting fossil-fueled passenger vehicles on US roads today, specifically pickups, and sport utility vehicles (“SUVs”) will help accomplish that mission. In addition to our vehicles, we are building out two charging networks – the Rivian Adventure Network and the Rivian Waypoints Network. Although the Rivian Adventure Network is currently for Rivian drivers, the vast majority of stations will be part of the publicly accessible Rivian Waypoints Network. Waypoint charging stations will be open to all EV drivers and focused on enabling all electric trips to state/national parks and other public lands. So far, Rivian has installed dozens of free-to-charge Waypoint stations in two of California’s most iconic parks, Yosemite National Park and the Golden Gate National Recreation Area, with more to come.¹

Rivian appreciates the Staff’s work on the Technology Review as it provides a first step towards providing the necessary data to answer the industry’s questions about how to best serve low income, underbanked and unbanked communities now and into the future. We respectfully submit the following feedback for Staff’s consideration as recommendations are finalized:

- We support Staff’s recommendation to continue deepening relationships and collaboration with the payments industry, including both credit card companies and peer-to-peer apps. We encourage staff to recommend concrete next steps on this front, including holding industry stakeholder events to increase information flow and education regarding payment technologies.
- We encourage Staff to prioritize Recommendation #3 and conduct additional statistically significant surveys specifically focused on how low income, underbanked and unbanked populations leverage different payment methods overall, not just for transportation or public EV charging, in order to assemble a holistic, data-driven picture to inform future policy.
- Finally, we encourage Staff to consider committing to a reassessment of payment technology trends in the near future so both the charging and payments industry are aware of when additional data will be needed to inform further decision making on this topic. Given how quickly payment technology is shifting and its potential impact on EV adoption overall, this reassessment merits a structured approach.

Thank you and we look forward to continuing to work with CARB and CARB Staff on this important topic.

Best,
Kelsey G. Johnson, Senior Policy Advisor, Rivian Automotive

¹ Adopt a Charger and Rivian Announce Collaboration to Install EV Chargers. Link to [press release](#).