

January 23, 2024

California Air Resources Board Re: 24-1-2: Electrify America's Proposed Cycle 4 Zero Emission Vehicle Investment Plan

Dear California Air Resources Board,

I am writing as an electric vehicle driver and an advocate for a robust and reliable Electrify America network. My family and I drive through California often during our holiday road trips and remarkably Electrify America has enabled reaching most of the United States via electric vehicle (EV). However, as all EV drivers learn, "range anxiety" is not the actual threat to EV's thriving in the California and the rest of the United States, "charger anxiety" is. The fact of the matter is that Electrify America has not established programs to verify and maintain charging station or charge dispenser reliability or availability. In fact, chargers were more reliable, and charging was easier in 2021 and 2022 before the Electrify America network started suffering from consistent reliability and speed issues based on poor hardware decisions and a lack of proactive maintenance.

Now, instead of looking at a trip computer and being able to anticipate a trip will take eight hours of driving and three twenty-minute stops, an EV driver simply has no idea how long a charge will take as chargers are frequently software derated by Electrify America or frustratingly broken for months at a time. When a charger is capable of functioning at only a fifth of its rated speed, charge time lengthens significantly, and apathy grows. When half of the stations are out of service, the throughput is proportionally impacted.

The most effective way Electrify America could positively impact EV driving in California and the rest of the US would be to maintain its network and expand existing charging stations. To that end Electrify America has consistently demonstrated that there will not be a robust maintenance plan until there are enforcement measures in place which compel it to do so.

I am excited to see the remaining \$200 of the Electrify America settlement spent genuinely creating the reliable and robust network Electrify America has been promising for the first three cycles. To this end, I believe that Electrify America should be subject to enhanced oversight during its proposed Cycle Four Zero Emission Vehicle Investment Plan as well as be subject to penalty for missing established reliability goals. To effectively do that we need to establish a set of performance standards for all Charge Point Operators and make these results visible to the public.

Thank you for your assistance ensuring that Electrify America's Proposed Cycle 4 Zero Emission Vehicle Investment Plan is a plan of action and not simply more of the same genuine lack of concern by a corporate entity. Californians deserve more.

Respectfully submitted,

Philip Waggoner