



June 24, 2019

RE: Draft Proposed Regulation Order on Electric Vehicle Supply Equipment (EVSE) Standards

On behalf of the steering committee members of the Charge Ahead California Campaign (Coalition for Clean Air, Communities for a Better Environment, Environment California, The Greenlining Institute, and the Natural Resources Defense Council), we write to express our support for the Air Resources Board's (ARB) proposed "Electric Vehicle Supply Equipment Standards," which would ensure more reliable and equitable payment access for all electric vehicle drivers.

To meet the goals of the Charge Ahead California Initiative (SB 1275, De León) of creating a mainstream market for electric vehicles and increasing access to those vehicles for low- and moderate-income households and for residents in disadvantaged communities, customers need reliable access to electricity as a transportation fuel where they live, work, and play. Senate Bill 454 (Corbett, 2013) was enacted by the Legislature to accomplish exactly this, and ARB's proposed regulations appropriately align with the vision of SB 454 by setting EVSE performance standards that provide drivers convenient and simple payment methods for charging.

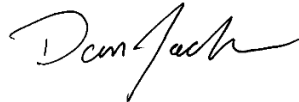
The proposed regulations would promote reliable access by requiring publicly accessible charging stations to accept credit card payment in the forms that would most align with customer expectation and open access, in addition to mobile payment technology. Customers should be able to pay for charging at these stations just as they would expect to be able to at gas stations or parking meters, and that entails a physical chip or magstripe credit card reader—not contactless cards or proprietary RFID tags, which ARB has recognized many customers may lack. The proposed regulations set out standards that are aligned with both the present and the future of customer charging needs, ensuring equitable access to charging as electric vehicle adoption expands to a broader and more diverse base of drivers.

We appreciate the opportunity to comment on the proposed regulations and look forward to working with ARB on continuing to promote the achievement of California's climate, air quality, and equity goals.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Max B.' with a stylized flourish.

Max Baumhefner
Natural Resources Defense Council

A handwritten signature in black ink, appearing to read 'Dan Jacobson' with a stylized flourish.

Dan Jacobson
Environment California

A handwritten signature in black ink, appearing to read 'Bahram' with a stylized flourish.

Bahram Fazeli
Communities for a Better Environment

A handwritten signature in black ink, appearing to read 'Bill Magavern' with a stylized flourish.

Bill Magavern
Coalition for Clean Air

A handwritten signature in black ink, appearing to read 'Alvaro' with a stylized flourish.

Alvaro Sanchez
The Greenlining Institute