



Comments of EVgo Services, LLC
Volkswagen California ZEV Investment Plan Cycle 1
California Air Resources Board
Submitted July 13, 2017

Thank you for the opportunity to comment on the supplemental filing in re: Volkswagen's (VW) zero emission vehicle (ZEV) investment plan. As a charging infrastructure leader—with the largest public fast charging network in the country and in California—EVgo continues to believe that any and all additional funding for fast charging infrastructure is welcome and important to help make electric vehicle (EV) adoption accessible for more Californians. Hundreds of millions of dollars are needed to add new infrastructure and to upgrade the existing EV charging infrastructure in California. A large injection of additional capital into ZEV infrastructure is necessary and beneficial for California drivers, EV deployments, and existing charging industry participants. Accordingly, we have been supportive of the infrastructure investments planned under the VW 2.0 liter settlement, as we have of the investments of any automaker looking to tackle EV infrastructure.

In response to the May 24th ARB letter requesting clarification, Electrify America has supplemented its investment plan. Below are EVgo comments on that supplement, building on our previous submissions for the record. The plan, as supplemented, reinforces 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 and are available to ARB members and staff if there are any questions we can help answer.

The Cycle 1 Plan's High Power, Public Fast Charging Network Promotes EV Adoption

Availability of charging is a critical factor in a consumer's willingness to purchase an EV, and particularly for residents of multi-unit dwellings and/or those that cannot afford to install home chargers, that means that public fast charging is virtually necessary to enable EV ownership. California's existing community charging networks need a significant upgrade to meet the market need from new EVs with high-capacity battery packs. New long-range EVs hitting the market, like the Tesla Model 3, Chevy Bolt, Nissan Leaf, Ford, Audi, Porsche, Karma, Volvo, Jaguar, BMW and others, will tax the existing EV charging stations. While the majority of today's vehicles require 30 minutes to reach a near-full charge on the dominant public fast chargers in the field (50kW), the long-range EVs will require 60 to 90 minutes. As a result, drivers will spend more time on the chargers already installed, and congestion will ensue. It is critical to increase charging speeds to High-Power, as proposed in the Cycle 1 Plan, in order to reduce charge times and relieve congestion.

The Cycle 1 Plan Needs to Move Forward

This is a critical time for the EV sector, and it is important to continue to move quickly to resolve ambiguities that slow market development. As the aforementioned longer-range EV models come to market at lower price points, EVs become an option for more drivers. The infrastructure needs to be built in order to translate that option into a purchase. EVgo's groundbreaking experience developing public fast charging in California paved the way for drivers and even other charging infrastructure companies. Currently, 90% of Californians live within 30 miles of an EVgo Freedom Station. Yet we recognize that more needs to be built, and it cannot be done by any one company. EVgo shares ARB's

desire to make ZEV adoption realistic for Californians across income levels statewide. A great deal of additional private investment is waiting on approval of the EA plan, and the sector needs to move quickly if it is to achieve its ambitious objectives. Added charging infrastructure enabled through Cycle I will help increase EV sales and attract additional private capital to produce a 'rising tide' for all the industry participants and accelerating California toward its EV goals.

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