May 17, 2021

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: EVgo Comments on California Air Resource Board's May 2021 Public Hearing on Proposed Clean Miles Standard

Dear Board Members and Staff:

EVgo thanks the California Air Resources Board (ARB) for the opportunity to comment on the final draft regulation of the Clean Miles Standard (CMS) pursuant to SB 1014 (Skinner, 2018) and for ARB's continued leadership in driving the state forward in its climate and zero emission vehicle (ZEV) goals.

Headquartered in Los Angeles, EVgo is the nation's largest public fast charging network for electric vehicles, and the first to be powered by 100% renewable energy. With more than 800 locations across 34 states, including over 300 fast charging locations in California, EVgo serves more than 250,000 customers nationwide. In 2020, EVgo announced a new partnership with General Motors, whereby EVgo will triple its DC fast charging (DCFC) network across 40 metropolitan areas over the coming years by building more than 2700 fast chargers across the country. EVgo also works with other automakers such as Nissan to expand charging in key markets. EVgo also brings first mover experience enabling the electrification of transportation network companies (TNCs) through partnerships with companies including Maven Gig Uber and Lyft. [1] [2]

As it stands today, the transportation sector constitutes the main source of greenhouse gas emissions (GHGs) in the state.[3] With rideshare drivers historically driving on average more than three times a personal use driver[4], TNCs hold outsized potential in producing emissions reductions and moving the state toward a zero-emission transportation future. Successful implementation of the Clean Miles Standard will allow California state to experience the health, economic, and grid benefits of a fully electrified rideshare sector.

Ahead of ARB's May 20th public hearing considering the proposed Clean Miles Standard, EVgo respectfully submits the following comments for ARB's consideration:

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[1] EVgo Press Release (print at: https://www.evgo.com/press-release/uber-and-evgo-launch-partnership-to-electrify-on-demand-rides-and-accelerate-zero-emission-transportation/)
[2] EVgo Press Release (print at: https://www.evgo.com/about/news/evgo-expands-local-fast-charging-network-and-supports-lyft-in-denver).
[3] California Air Resources Board, https://ww2.arb.ca.gov/news/latest-ghg-inventory-shows-california-remains-below-2020-emissions-target
[4] UC Davis, Policy Institute for Energy Environment and the Economy, *Policy Pathways to TNC Electrification in California,* May 2020.

1) **DCFC plays critical role in electrification of light duty fleets such as TNCs, and ARB should coordinate with the CEC to ensure that adequate charging infrastructure is deployed to support the Clean Miles Standard, and should consider extending the Fast Charging Incentive (FCI) program under the Low Carbon Fuel Standard.**

As ARB moves past the adoption of Clean Miles Standard, the importance of widespread DC fast charging across the state to support LDV fleets in order to support such as rideshare and delivery cannot be understated. Prior to the pandemic, as stated in earlier comments to ARB, EVgo saw high TNC usage on its fast charging network for two underlying reasons:

i. Rideshare drivers' vehicle miles traveled are on average 3 times that of personal use drivers[5]
ii. Fast charging – sometimes multiple times per day – represents the vast majority of charging for rideshare drivers, for whom every minute of charging represents lost potential revenue.

Fast charging infrastructure in particular is critical to reaching the state's increasing population of EV drivers and is especially crucial to enable electrification for drivers without reliable access to charging at home or in the workplace, residents of multi-unit dwellings who rely on public charging for the majority of their charging needs, drivers utilizing key transit corridors, as well as light duty vehicle fleets, including car sharing and ride sharing applications. In a CPUC report entitled Electrifying the Ride-Sourcing Sector in California, Lyft reported that most drivers on its Express Drive program have no access to home charging, which further points to the importance of fast-charging infrastructure to unlock TNC EV usage.[6] Even those drivers who have access to overnight charging and drive for a full day will stop to charge midday so that they may get back on the road quickly.

ARB can support increased infrastructure proliferation by coordinating with the Energy Commission to ensure infrastructure investments, especially DC fast charging, is funded in a targeted way to support the Clean Miles Standard. Additionally, ARB should explore an extension of the FCI program beyond 2025, which is critical for driving investments in infrastructure as part of the Low Carbon Fuel Standard.

2. **TNCs should be incentivized to invest in ZEV charging infrastructure with experienced partners where there are gaps in coverage.**

In its draft regulation, the Board provides flexibility to TNCs by allowing TNCs to earn compliance credits by investing in bike lanes and integrating with public transit. EVgo would recommend the Board to also consider compliance credits for TNC investments with experienced partners in EV charging infrastructure. The state currently is projected to need 1.5 million chargers by 2030 to support the state's goal of 8 million ZEVs on the road, including 67,000 fast chargers.[7]

By providing credits to TNCs that help expand public charging infrastructure, the Clean Miles Standard can help leverage private sector dollars to simultaneously fund the chargers needed for rideshare drivers but also help the state meet the needed charging infrastructure for all light duty vehicles. ARB and the CPUC

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[5] UC Davis, Policy Institute for Energy Environment and the Economy, *Policy Pathways to TNC Electrification in California,* May 2020.

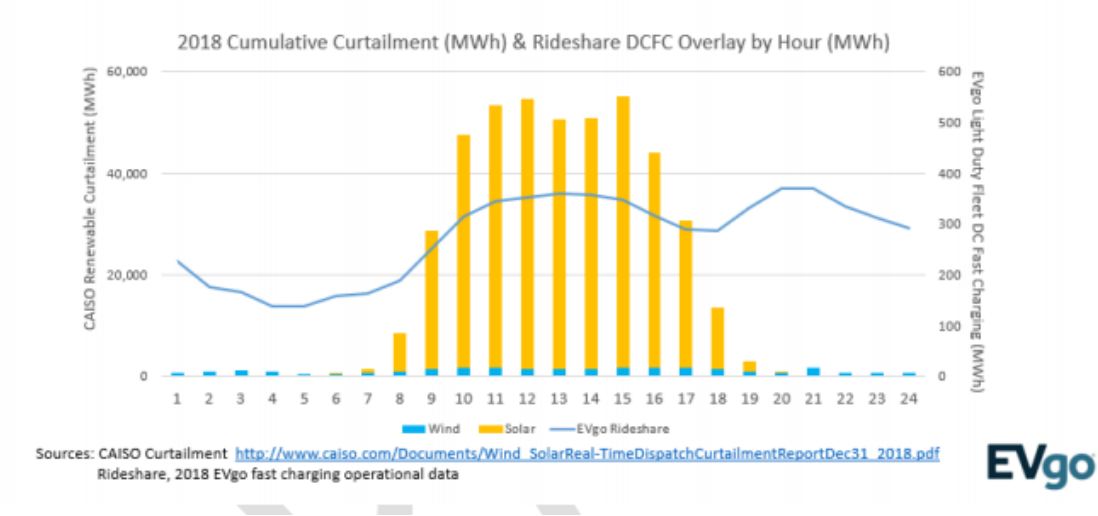
[6] California Public Utilities Commission, *Electrifying the Ride-Sourcing Sector in California: Assessing the Opportunity*, April 2018

[7] California Energy Commission, *Assembly Bill 2127 Electric Vehicle Charging Infrastructure Assessment Analyzing Charging Needs to Support Zero-Emission Vehicles in 2030,* January 2021

– as the implementer of the standard -- should coordinate with CEC to devise credit incentives against the percent eVMT targets for TNCs for infrastructure deployment in these areas.

3. Rideshare electrification delivers benefits to the grid as a whole.

The benefits of ride share electrification extends beyond air quality. As stated in EVgo's July 2020 comments to ARB, the charging patterns of LDV fleets as evidenced on EVgo's network have also shown a demonstrable and material benefit to the grid. [8] Comparing the cumulative annual load profile by hour from EVgo's LDV fleet fast charging with the CAISO cumulative renewable energy curtailment by hour demonstrated the alignment of LDV rideshare fast charging during midday hours. Fundamentally, rideshare fleet drivers seek to maximize driving time and revenue during the morning and evening rush hours and maximize charging midday and at night, as seen in the graph below, leading to concentrated midday charging, strongly aligning with solar curtailment in California.



The opportunity to provide benefits to the grid by aligning peak solar and fast charging LDV fleets are likely to increase as EVgo builds out its network and demand from rideshare increases. The Clean Miles Standard would bolster these benefits by accelerating the growth of electric rideshare and help generate simultaneous, outsized air quality and grid benefits while supporting state goals for vehicle to grid integration, including those set out by SB 676 (Bradford, 2019) which includes charging to "utilize available renewable electric generation" and "avoid curtailments of renewable electric generation."[9] The patterns of TNC driver charging profiles naturally aligns with these goals even without price signals, making it an ideal use case.

4. Consider vehicle incentives to help spur rideshare electrification.

With implementation of the Clean Miles Standard, the need to continue important vehicle incentive programs like the Clean Vehicle Rebate Project (CVRP) and Clean Cars 4 All (CC4A) that are instrumental

[8] For more information, please refer to Electric Ridesharing Benefits the Grid, and EVgo Has the Data to Prove It on Greentech Media, https://www.greentechmedia.com/articles/read/electric-ridesharing-benefit-the-grid-evgo
[9] SB 676, Bradford, https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB676

to meeting California's goal of all EV sales by 2035 becomes even more critical. As the standard kicks into effects, EVgo recommends that ARB evaluate how existing vehicle incentive programs, or the creation of new ones – can help accelerate deployment and make EVs more accessible to TNC drivers. Drivers in this segment can often face particular challenges with access to these incentives due program structure limitations with respect to models of vehicle ownership or purchase of EVs from a growing secondhand market.

Underlying these challenges is the fact that California today does not have an incentive geared towards TNC electrification. Policy shifts towards these incentives can lead to successful deployments of EVs for ridesharing. For example, in Colorado, Lyft deployed 200 Kia Niros in its Express Drive program after the state opened its EV tax credit to TNC drivers.[10]

While EVgo understands that funding from the Clean Vehicle Rebate Project (CVRP) is limited and that the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP) is limited to heavy duty vehicles, EVgo would be remiss if we did not highlight the fact that California could quickly fall behind in electrified rideshare due to lack of available incentives for light duty fleet vehicles. With ARB as the administrator of many of these incentive programs, EVgo recommends that these programs or be explored further.

Conclusion

EVgo supports the adoption of the Clean Miles Standard and thanks ARB for the opportunity to provide feedback for its consideration as the state moves forward with the implementation. If EVgo can provide any further information or be of resource, please do not hesitate to contact the EVgo team.

Best,

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[10] Lyft, *Working toward a fully electric future — and challenging partners to do the same,* https://www.lyft.com/blog/posts/lyft-denver-ev-2019