



My name is Carleen Cullen, founder and Executive Director of Cool the Earth, a 2018 campaign policy advisor for Governor Newsom, and the ChargeX consortium. I urge CARB to reject Electrify America's plan due to widespread evidence of station failures and customer dissatisfaction, particularly impacting those in our equity communities, who rely most on public charging.

Recommendations that we believe fit within the consent decree's framework:

1. **Reject the Current Plan:** Encourage EA to reformulate its strategy in collaboration with CARB staff.
2. **Prioritize Station Replacement and Maintenance:** From the \$80 million allocated for existing sites, \$25 million is for station replacement, with the rest for operations, maintenance, and demand fees. CARB should work with EA to remove the \$25 million cap, prioritizing the replacement of stations from all Cycles with GEN 4 models. Operations and maintenance come next -- even Gen 4 stations have reliability problems -- followed by new stations and demand fees, using any remaining funds.
3. **Develop Specific Metrics:** EA should submit detailed metrics in the selection methodology, with CARB staff ensuring these metrics identify all underperforming stations.
4. **Enforce Penalties:** Implement consent decree penalties from the time underperforming stations are decommissioned until new ones are operational.

The focus should be on reliability; the expected increase in stations, fueled by Tesla, state, and federal investments, will expand availability. Other issues that contribute to station congestion are EA's broken stations, slow power delivery, and possibly their business practice of offering free charging to drivers of select popular vehicles from Ford, Kia, Hyundai, and companies from the VW group including VW ID 4, Audi, Porsche, and others.

I urge the board to match investment in 'Clean Cars for All' with reliable charging stations.

Cool the Earth is a 501(c)3 nonprofit organization

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