

December 7, 2020

Sydney Vergis
Division Chief, Mobile Source Control Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Request to fund EVSE in the form of public charging credits

Dear Sydney Vergis:

The Sacramento Metropolitan Air Quality Management (Sac Metro Air District) was granted \$9M in Green House Gas Reduction funds from the California Air Resources Board (CARB) to participate in the Clean Cars 4 All (CC4A) program. The CC4A program supports Sac Metro Air District's mission to accelerate zero and near zero emission vehicle technology adoption throughout the Sacramento Region. The CC4A program makes financial incentives available to participants that can be used to replace older vehicles with a cleaner plug-in vehicle, or to utilize alternative sources of cleaner transportation such as public transit, ride share, car share, and bike share. In addition to the vehicle, program participants are eligible through the CC4A program for up to \$2000 toward electric vehicle service equipment (EVSE) and installation expenses. The current structure of the EVSE incentive is not viable for all participants as the upfront cost burdens are an issue for homeowners as well as frequent movers and renters. Also, it can be difficult for renters and participants in multi-family dwelling units to receive permission to install charging infrastructure. Therefore, we request flexibility with the funding of EVSE in the form of public charging credits.

The current EVSE program design requires participants to cover the upfront cost for infrastructure installation, to be reimbursed up to \$2,000 later by the Sac Metro Air District. This reimbursement does not typically cover the full cost associated with the charger and retrofitting an electrical system to accommodate the load required for charging. This design may work for some, but it leaves behind many others. Our data shows that most vehicles funded in the CC4A program go to individuals and families that lack the resources and stability that come with home ownership.

As identified in the Sacramento Region 2040 Metropolitan Transportation Plan, Sacramento region residents travel on average 25 miles per day¹. Of the cars sold through our CC4A program, 90% have an electric range greater than 25 miles. The charging credits would help motivate our Clean Cars 4 All participants to use electric miles instead of gasoline, thus ensuring they are the cleanest miles. With efforts around the region, there is now charging infrastructure to support this demand. Electrify America designated Sacramento as the first Green City in its Zero Emission Vehicle Investment Plan in 2017. This brought a wealth of chargers to our area. The boost in CC4A funding could increase motivation to have electric

¹ https://www.sacog.org/sites/main/files/file-attachments/appendix_e___final.pdf?1573685716

vehicle charging providers continue to expand their inter-network agreements, keeping Sacramento out in front of California's push for electrification. Sac Metro Air District will continue to provide incentives and work with our partners and local jurisdictions to provide more publicly accessible chargers, which makes the ability to provide participants public charging credits for the full value of the infrastructure incentive more impactful.

Lastly, the Sac Metro Air District has always searched for methods to serve all communities, especially the unbanked population. We will continue to work with service providers and partners to ensure this new flexibility is an option for the unbanked population. As many community members are facing economic challenges and hardship due to COVID 19, this flexibility would help community members to continue to gain dignified, safe access to work, medical appointments, daycare, and food.

Thank you for your leadership on this issue, and your consideration of our request. We look forward to continuing to work towards providing clean and equitable transportation for all Californians.

A handwritten signature in black ink, appearing to read 'Jaime Lemus', with a stylized, flowing script.

Jaime Lemus
Division Manager / Transportation and Climate Change Division