

May 28, 2021

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Reference: Comments in Support of Electrify America LLC's Cycle 3 California Zero Emission Vehicle (ZEV) Investment Plan

Dear California Air Resources Board Members,

ABB is pleased to submit comments to the California Air Resources Board (ARB) in support of Electrify America LLC's Cycle 3 California Zero Emissions Vehicle Investment Plan (Plan), which will build on previous investments in a diversified charging infrastructure that will meet the needs of all Californians.

ABB is a global electrification and automation leader and has been developing and manufacturing electric vehicle fast charging technology for nearly a decade. California is home to 200 of our 20,000 US employees along. With over 20,000 DC fast-chargers (DCFC) deployed as well as hundreds of thousands of L2 chargers, ABB has the largest installed base of EV chargers in the world. ABB is also a leading provider of utility and customer side electrical equipment that is often used to enable grid interconnection of EVSE.

ABB is proud of its work with Electrify America to remove a foundational barrier to transportation electrification across the US and here in California. ARB's timely approval of the Plan will continue the momentum and accelerate EV adoption throughout the state.

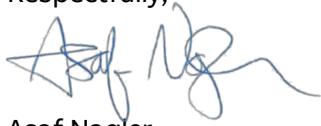
The Plan invests in multiple parts of the transportation system and focuses on equity and inclusion in the e-mobility economy. These comprehensive investments in California will serve as a model for practical and equitable charging infrastructure programs that will accelerate the economic and environmental benefits of transport electrification across the United States. Importantly, a focus on disadvantaged communities underpins the investment plan. A few highlights include:

- **Shared Mobility**-The high utilization rates of shared mobility platforms, like taxis, car share, and transportation network companies make them ideal candidates for electrification from both a cost and emissions perspective. A focus on providing charging to these drivers who may not have access at home also helps ensure equity in the e-mobility economy.
- **Ports and Trucks**- Investments in medium and heavy-duty vehicles, along with drayage, can have an outsized impact on the transportation sector's transition to zero emissions. These vehicles account for over 20% of transportation emissions and their emissions have been growing over the past six years, whereas light duty vehicle emissions have remained flat. Transitioning to medium- and heavy-duty electric vehicles will also alleviate the disproportionate emissions impact on frontline communities that breathe in 66% more mobile-source air pollution – an important step toward environmental justice.
- **Education, Awareness, and Training**– Education and awareness continue to be one of the biggest hurdles to EV adoption. While range anxiety is often cited as a concern of prospective buyers, owners of EVs rarely cite range as a concern. Education and awareness are needed to persuade more drivers that going electric is a benefit. Building an ecosystem

of trained workers and innovators is key to the long-term growth and success of the e-mobility economy.

The Plan's focus on deploying charging infrastructure to communities, high-emitting sectors, and driving awareness of the prevalence of chargers and benefits of EVs will make significant strides in promoting EV adoption in California. For these reasons, we welcome and support ARB's timely approval of Electrify America's Plan.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Asaf Nagler', with a stylized flourish extending to the right.

Asaf Nagler
Senior Director, Government Relations