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October 4, 2022

Ms. Liane Randolph, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: California Air Resources Board (CARB) FY 2022-2023 Funding Plan – Clean Transportation Incentives**

Dear Chair Randolph and members of the Board,

ChargePoint appreciates the opportunity to provide comments in support of **CARB's FY 2022-2023 Funding Plan**. We would like to highlight our support of the *Paid Card Financial Assistance Proposal* as part of the Clean Transportation Incentives and offer a few recommendations to help make the program a success.

About ChargePoint Since 2007, ChargePoint has been creating the new fueling network to move all people and goods on electricity. ChargePoint is committed to making it easy for businesses and drivers to go electric, with a world leading electric vehicle (EV) charging network and the most complete set of charging solutions available today. ChargePoint's cloud subscription platform and software-defined charging hardware is designed internally and includes options for every charging scenario from home and multifamily to workplace, parking, hospitality, retail, and fleets of all kinds. Currently there are more than 188,000 ports on the ChargePoint network across North America and Europe and an additional 320,000 ports accessible via roaming agreements.

**ChargePoint supports providing new low-income EV drivers with financial assistance to charge at public EV charging stations because these individuals may rely more on public charging.** Not having access to EV charging at home can be a significant barrier for low-income individuals to adopt EVs, especially residents of multifamily dwellings who may not have charging access at their multifamily dwelling complex. According to a California Energy Commission (CEC) report, 47 percent of low-income Californians live in multifamily housing.<sup>1</sup> While the EVSE industry is working with both CEC and Public Utilities Commission to deploy the EV chargers at multi-family dwellings, this proposed assistance will cover a gap for new EV drivers. To make this program a success, ChargePoint offers the following recommendations with respect to:

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<sup>1</sup> [California Energy Commission: "Clean Energy in low-income multifamily buildings action plan"](#)



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## Card Payment Technology

- **Cards should be reloadable debit cards.** It is important that any card issued have be reloadable capabilities so that EV drivers can upload their own funds on the card, once the CARB provided funds are finished. There are card providers whose cards can have funds uploaded electronically or retail stores (such as 7-11, Dollar Tree, CVS, Walmart).
- **Cards should use Open-Loop, EMV and Contactless “Tap and Go” Technology.** We recommend CARB work with a debit card issuer provider that issues a debit card that has both EMV chip and Near Field Communication (NFC) capabilities or “Contactless”. Many prepaid cards only have magnetic stripes which is an outdated technology that will soon be obsolete. In 2021, Mastercard announced plans to eliminate new credit and debit cards with magnetic stripes by 2024.<sup>2</sup> In addition, according to the 2021 Debit Issuer Study conducted by Pulse, 94% of all debit cards issued by banks will be contactless by the end of 2023.<sup>3</sup>
- **Coordinate and consider partnering with California Integrated Travel Project (ITP) Efforts.** CARB should work closely with CAL-ITP who has expertise on reducing barriers to transit, including digital ones that includes the introduction of tap-and-pay systems on transit agency fleets.
- **Use this opportunity to provide a financial tool.** CARB has prioritized working to ensure the transition to EVs is done in an equitable manner so that unbanked and underbanked are not left behind. With the issuance of an open-loop debit card, CARB can provide a financial tool that “banks” individuals who might otherwise not. Therefore, it should look to work with debit card issuers that provide alternative payment tools such as MoCaFi, Venmo, PayPal, Cash App, Revolute, Chime and others.
- **Determine Metrics to Measure Program Success.** What defines success for this program? Is it if drivers use all the funds in a year? Is it if new EV Drivers stay keep their EV? One piece of information would be to find out if the recipients were able to charge at home? Where did they regularly charge at public EV station? How far did they have to travel to it? This information will help identify gaps that exist in EV infrastructure.

## Study on Payment Methods Used by Low-income EV Drivers

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<sup>2</sup> [Swiping Left on Magnetic Stripes](#)

<sup>3</sup> [2021 Debit Issuer Study by Pulse](#)



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CARB should retain a third-party consultant to conduct study in conjunction with the financial assistance proposal. The study should analyze the existing payment methods that low-income, under-banked and unbanked use to pay for goods and services, understand what type of mobile

phones they have access to and how they the transactions occur at the EV station study the use of over the course of a year. Acquiring this data will inform CARB if the success of this program as well as additional assistance that may be needed.

### **Conclusion**

In sum, ChargePoint supports CARB's efforts to offer financial assistance in the form of payment card, preferably a debit card, to further incentivize new low-income EV drivers to transition away from internal combustion engines, lower the barrier of being unable to charge at home for some and to become a permanent EV driver.

Please let me know if you have any question on our comments, [cesar.diaz@chargepoint.com](mailto:cesar.diaz@chargepoint.com)

Sincerely,

A handwritten signature in black ink, appearing to read "Cesar Diaz".

Cesar Diaz  
Senior Public Policy Manager  
ChargePoint