

A “Great” Deal for California and the future of Electric Vehicles in California.

“Contained within the Volkswagen settlement agreement there is a great opportunity for California to really move the California ZEV initiatives forward”.

An increase in funding for Zero Emission Vehicles is critical and will result in many benefits to the state of California as well as Zero Emission Vehicle manufacturers, Electric Vehicle Supply Equipment Service Providers, Electric Vehicle Drivers, Power utility companies and maintenance companies supporting the ZEV marketplace.

The Electrify America plan was made public by the California Air Resources Board (CARB) on march 14, 2017. It is required under “Appendix C” of California’s consent decree.

“We urge CARB to approve VW’s plan and to allow Electrify America to continue its work”

We believe that this plan will be of great benefit to the state of California for the following reasons:

- **Without CARB and government involvement now there is no incentive for private companies to build Electric Vehicle charging stations or deploy charging systems.** Claims by some companies that “VW may be able to obtain substantial competitive benefits, if not a monopoly on electric vehicle infrastructure” are completely absurd because the connectors as well as payment systems proposed for use by VW are open to all vehicles and consumers which support the “SAE CCS Combined Charging Standard as well as CHAdeMO standard”. Other Electric Vehicle manufacturers such as General Motors, Ford, Nissan, and Tesla stand to greatly benefit from this investment as their vehicles will be able to utilize the infrastructure paid for by VW.

“Why penalize EV Drivers by asking VW to place chargers in non-prime locations such as Disadvantaged and Low Income communities where the chargers will have little to no utilization”.

- We would like to emphasize that the payment systems being proposed for use by VW are open systems which will allow the use of the charging infrastructure by EV and Plug-in Hybrid drivers of all income levels and without the need to enter a membership agreement. Closed payment systems proposed by other EVSE manufacturers are not in the best interest of the State of California and their views are not supported by all EVSE manufacturers such as BTCPower Inc.
- Investment in Electric Vehicle charging infrastructure will generate work for many companies across the great state of California and will eventually employ thousands of US citizens providing maintenance, installation and other services which are required to sustain the ZEV charging network proposed by VW. These are new jobs in a new industry which cannot be outsourced to other countries.
- Investment in Electric Vehicle charging infrastructure has been proven to stimulate the adoption and sales of Zero Emission Vehicles which should benefit Tesla’s model 3 vehicles as well as General Motors new award winning Bolt.

- The VW ZEV proposal also contains provisions for the placement of Electric Vehicle charging infrastructure in underserved communities. These lower income locations have been clearly shown to not be profitable to Electric Vehicle Service Providers. Without government investment consumers living in these communities will never see the benefits of Electric Vehicles as well as Plug-in hybrid vehicles.

OBJECTIVE: Ensure that VWs spending complements existing investments. To meet Electric Vehicle penetration, it has been demonstrated that robust DC Fast Charging networks are critical to electric vehicle acceptance. It has also been demonstrated that existing infrastructure and DC Fast Charger installations are so small that any number of chargers that VW places are just a portion of the entire infrastructure needed by the state of California.

“Please allow VW to install DC Fast Chargers. Why impede VW’s installation of Electric Vehicle chargers? What possible benefit could that provide to the state of California. The need for charging infrastructure is so great. The VW investment is only a portion of what is needed!”

OBJECTIVE: Prioritize infrastructure, awareness and visible progress. VW is working with existing stakeholders and will drive public awareness efforts.

RECOMMENDATION: We should assist VW to disseminate Electric Vehicle benefits as well as charging education programs. This will certainly allow for the greater adoption of charge networks. While we agree, VW should work with the Veloz education campaign. A lot of the work should also be done through other venues and not only the Veloz education campaign.

OBJECTIVE: Ensure competition and customer choice. Senate bill 350, CARB has directed that spending stimulate innovation, competition, and customer choice in charging equipment, networks, and service and not interfere with or undermine established and emerging businesses in the EV marketplace.

BTC’s VIEW: The Volkswagen plan “IS” inclusive of all networks and charge equipment by allowing a competitive bidding process to occur. The need for charging infrastructure in the US is so large that any substantial hardware deployment and installation program such as this one is “*only a partial*” installation of what is needed by the State of California. There is plenty of room for other charge network operators to install additional equipment. In fact, this rollout is probably the best thing that could have ever happened to the industry as this will accelerate competition among charge station operators.

OUR CONCLUSION:

The money invested in ZEV, zero emission vehicle charging infrastructure will be redistributed to communities across the State of California, including our district/state to create jobs and stimulates the local economy. In our Company located in Santa Ana, CA we have Engineers and technicians who are learning the technical and intellectual skills required to support the Electric Vehicle charging marketplace. I would also like to add that BTCpower Inc. is a US based design and fabricator of DC as well as AC charging systems. An investment in Electric Vehicle charging infrastructure will greatly benefit our Company as well as the State of California. Please help make Zero Emissions Vehicles a higher priority for our great State of California by allowing and continuing the investment in electric vehicle infrastructure.

Sincerely,

Carlos Cortes

VP Engineering

Broadband Telco Power Inc.