June 24, 2019

Mary D. Nichols, Chair

California Air Resources Board

1011 I Street, P.O. Box 2415

Sacramento, CA 95814

Re: Docket EVSE201 - Electric Vehicle Supply Equipment Standards

Dear Chair Nichols,

Sonoma Clean Power (SCP) is committed to reducing GHG emissions in our service territory, continuing to address emissions from transportation is a critical part of achieving our mission. SCP is appreciative of the Air Resources Board’s (ARB’s) leadership and has enjoyed collaborating with staff in the Low Carbon Fuel Standard (LCFS) Program. We write today to encourage the ARB to avoid inadvertently creating additional barriers to widespread adoption of electric vehicles and charging infrastructure.

In 2015, SCP launched DriveEV and became the first Community Choice Aggregator (CCA) to fund transportation electrification out of generation revenues. GHGs associated with transportation are a significant contributor to the overall emissions in our rural territory. This fact lead us to focus beyond offering a low-GHG electricity supply and to directly address transportation emissions. Over the three years that the program operated, SCP incentivized 1260 electric vehicles.

A summary of the results is available online at: <https://sonomacleanpower.org/drive-ev-program-results>

In addition, an independent evaluation of Sonoma Clean Power’s third and final year of offering the Drive EV program may be found here:

<https://sonomacleanpower.org/uploads/documents/DriveEV_EvalReport_SCPreview_FINAL.pdf>

Our efforts don’t stop there. SCP has been giving away grid connected home EVSE for four years. In total we have shipped over 2700 level 2 charging stations for installation at local homes and businesses. 600 of these EVSE participate in our GridSavvy (demand response program) and are actively dispatched. SCP is also partnering with our four local transit agencies on a project to identify infrastructure needs to meet their electrification goals.

1. **No retro-active modifications to electric vehicle chargin station requirements should be made, this will add costs to a nascent market**

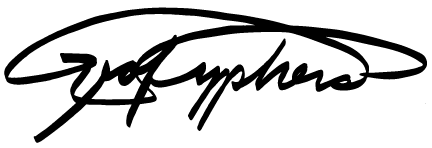
The current proposal of requiring credit card reading technologies on not just new but existing electric vehicle charging stations (EVSEs) will unnecessarily raise costs. This is akin to retro-active ratemaking, and would punish early adopters. Indeed, some site hosts may elect to simply remove existing EVSE units to avoid being forced to pay for expensive retrofits.

1. **Codifying the need for a particular technology – credit card readers – will lead to over-investment in infrastructure which will someday be obsolete**

SCP supports the goal of enhanced transparency and simplicity of reporting. However, mandating the use of credit card readers today will create a stagnant fleet of chargers unable to incorporate future changes in payment processing and data reporting. The ecosystem of payment processing and forms of payment is rapidly evolving (e.g. wireless payments like PayPal, new forms of currency like Bitcoin, etc). One can imagine the value today of an early 2000’s mandate to require, for example, check-scanning equipment at fueling stations.

We appreciate the opportunity to provide this feedback and look forward to a continued partnership in transportation electrification.

Sincerely,



Geof Syphers

CEO, Sonoma Clean Power