

# GENERAL MOTORS

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Mr. Mark Williams, Mailstop 3E  
California Air Resources Board  
P.O. Box 2815  
Sacramento, California 95812

**Subject: General Motors Comments – Electrify America’s Cycle 2 ZEV Investment Plan**

Mr. Williams:

General Motors LLC (GM) appreciates the opportunity to provide comments on Electrify America’s Cycle 2 ZEV Investment Plan for California, and would like to encourage California’s Air Resources Board to approve the plan, with only a few adjustments.

Automakers have made enormous investments in the electrification of transportation – GM alone has invested billions of dollars to develop electrification technologies including: investments in our industry award-winning electric vehicles (EV), the Chevrolet Bolt EV and the Chevrolet Volt; investments in our Maven platform, with approximately 1,000 Chevrolet Bolt EVs deployed in ride-sharing services offered in seven US cities, including three of California’s major metropolitan areas; and investments in our Cruise Automation platform, with a fleet of 180 autonomous Chevrolet Bolt EVs currently in testing on the streets of San Francisco, and several other US locations.

Electrify America’s Cycle 2 Investment Plan for California calls for a much-needed \$200 million investment in EV charging infrastructure and EV education and awareness. The planned investments in DC fast-charging highway corridors and in metro areas are particularly critical, as we continue to increase the deployment of long-range Bolt EVs, including Bolt EVs deployed in advanced urban mobility services. Additionally, we’d like to offer the following suggestions:

- Home Charging – Electrify America (EA) has proposed \$8-\$12mil to fund up to 3,300 L2 home chargers, create an online web tool, and offer demand response programs. EA also states they “may expand to offer the same or similar L2 charging in workplaces during Cycle 2.” While we agree there is a real need to address home charging challenges, we do not believe this is a good use of EA funds. Instead, we do support investments in workplace charging, as this investment

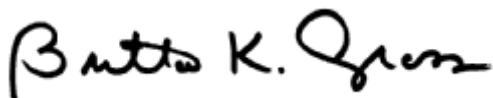
can be a significant driver of EV adoption. Therefore, we suggest the funding proposed for home charging be reallocated to workplace charging.

- Shared mobility - “Electrify America plans to dedicate these sites to shared mobility drivers.” GM supports the notion of dedicating some portion of metro stations to shared mobility services, while “maintaining an optimal charging experience for all drivers”, and would encourage the ARB to ensure that dedicated sites are not for the benefit of an individual company, but rather available to all fleet and commercial operators in this evolving segment that moves both people and goods.
- Electrify America/VW firewall and brand-neutrality – we would like to again emphasize the importance of ensuring there is a strict data firewall between Electrify America and VW that protects all automaker and consumer data that is shared with Electrify America. In addition, EA investments in the ZEV Adoption awareness campaign and the Station Utilization marketing campaigns are required to be automaker brand-neutral.

This is a crucial time for the EV market as both industry and policymakers work to broaden the appeal of EVs beyond early adopters. EV charging infrastructure is vital to the growth of the EV market and will lead to long-lasting emissions reductions that increase over time as the market expands. GM views the proposed Electrify America investments in charging infrastructure and EV education and awareness as a valuable opportunity to advance the overall EV industry and accelerate market growth.

GM greatly appreciates California’s commitment to support the strategic transition to transportation electrification and all efforts to help drive this emerging market.

Sincerely,



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