EVgo
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July 5, 2018

Sam Wade
Chief, Transportation Fuels Branch, Industrial Strategies Division
California Air Resources Board
1001 I Street
Sacramento, California 95814

RE: Proposed Amendments to the Low Carbon Fuel Standard Regulation (LCFS18)

Mr. Wade,

EVgo is grateful for the leadership of the California Air Resources Board (CARB) as it relates to transportation electrification. EVgo is leading the way for vehicle electrification across the state and the country, and more than 90% of Californians now live within 35 miles of an EVgo fast charging station. The work EVgo has done in partnership with CARB, the California Energy Commission, the California Public Utilities Commission (CPUC) and other industry partners have led to the electric vehicle (EV) charging infrastructure enabling California's leadership on EV adoption today. However, even more work and investment - building on what we have already done together - is needed to enable ubiquitous adoption of EVs in California. Access to robust public charging infrastructure will make the purchase of zero emission vehicles (ZEVs) an easier choice for Californians.

EVgo operates America's largest public EV fast charging network, with over 1050 chargers in 66 metropolitan markets. Primarily using Direct Current fast chargers (DCFCs), EVgo fast charges more drivers for more miles than any public charging network in the nation. We provide over 100,000 monthly charges to 50,000+ EV drivers, powering EVs to drive over 5,000,000 miles monthly. Currently, we have more than 500 fast chargers deployed in California with many more sites under construction and dozens more coming this year. EVgo welcomes the opportunity to work closely with the state to expand that infrastructure to enable mass adoption of EVs.

The Low Carbon Fuel Standard (LCFS) is one such program that has been pivotal in stimulating investment in ZEV infrastructure, and EVgo applauds CARB for its leadership in taking LCFS one step further by proposing DC Fast Charging Infrastructure (FCI) Credits which will accelerate realization of the 10,000 DCFCs by 2025 goal envisioned by Governor Brown in his Executive Order. As CARB continues in its rulemaking process regarding the FCI credit, EVgo respectfully requests that CARB consider the following changes to their proposed crediting formula:

I. Alter the formula so developers are incentivized to deploy ZEV infrastructure in locations with higher, not lower, site utilization.

The draft FCI credit formula misaligns incentivizes for EV infrastructure providers by encouraging development in lower utilization areas. The subtraction of kWh in the formula will have an unintended effect of encouraging an oversupply of EV infrastructure in areas that have ample space and fewer real estate constraints – but few EV drivers – because infrastructure providers will want to build solely to take advantage of the credits.

II. Remove proposed payment method requirements and verification of charging unit performance, as both issues are being addressed through separate rulemakings.

In its proposed plan, CARB suggests that chargers must accept all major methods of payment via credit card or debit card to be eligible for the FCI credit. However, given that a separate rulemaking on payment methods is already ongoing within CARB as it relates to SB 454 and interoperability, we would ask that CARB hold on this requirement for LCFS until a final order has been issued in the interoperability rulemaking process.

Similarly, we respectfully request that CARB remove the charging unit performance verification requirement, as this issue is being addressed by the Division of Measurements and Standards in a separate rulemaking.

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III. Allow transportation network companies (TNCs), which serve the public, to benefit from LCFS crediting by altering access requirements.

Given the critical role that TNCs have in serving the public and increasing public awareness of EVs, we respectfully suggest that DCFCs serving TNC fleets be eligible for the FCI credit. The public benefits from electrification of TNCs, particularly as more and more Californians are choosing to rely on ridesharing and forgo personal vehicle ownership altogether.

As written, the draft rules would disincentivize TNCs from partnering building out ZEV infrastructure, as the LCFS rules only apply to stations open to the public. This restriction comes at a time when proposed legislation (SB104) would require TNCs to electrify. Similarly, ongoing discussions at the CPUC about the environmental implications of the TNC transformation – notably the TNC "disruption's" effect on greenhouse gas emissions – is creating increased pressure to electrify their fleets.[1]

Because individual TNC operators often drive upwards of 50,000 miles per year, companies are pursuing dedicated infrastructure for their drivers. The purpose of dedicated infrastructure is to ensure that TNCs can meet their greenhouse gas reduction goals, have charging infrastructure readily available so that drivers can minimize "dead time," and so that drivers may find available charging as quickly as possible so that they may serve their customers. In a CPUC report entitled *Electrifying the Ride-Sourcing Sector in California,* Lyft recently reported that most drivers on its Express Drive program have no access to home charging, which further points to the importance of fast-charging infrastructure to unlock TNC EV usage.

Promoting dedicated TNC fast-charging infrastructure would have many ripple effects that promote electric vehicle use, both within TNCs and in the greater public.

First, TNCs account for an increasing share of California vehicle miles travelled, and access to fast-charging infrastructure is consistently listed as a key barrier to EV TNC deployment. According to the CPUC, "lack of access to fast charging was identified as the most significant barrier to EV use" and drivers with EVs "would have worked an additional 10 hours per week, on average, if they had access to faster and easier charging."

Second, TNC drivers with EVs serve as ideal EV ambassadors to the driving public. While dedicated charging infrastructure is not available to the public, TNC drivers serve the public and make their ride hailing services available to the public. Again referencing the *Electrifying the Ride-Sourcing Sector in California* report, the CPUC writes that exposure to EVs for both the public and TNC drivers "has been found to result in lasting positive impressions that influence subsequent vehicle purchase decisions." Sixty-seven percent of drivers reported that passengers discussed the car's EV technology at least once per work period, suggesting that the TNC sector can serve as a platform to expose passengers to EVs. Therefore, allowing TNCs to unlock LCFS credits would greatly increase TNC EVs on the road, which in turn would spur personal-use drivers to purchase EVs. Even in the case that a passenger does not ultimately purchase an EV, this has the direct GHG reduction benefit of rideshare customers replacing their own personal vehicle miles traveled with EV-powered TNC rides.

Finally, through our experience with our own public network, we have found that dedicated infrastructure for TNCs benefits the public by taking TNC EV drivers off of the public network. TNC drivers' need for frequent charges leads to queuing at stations. This can – and does - negatively impact the public charging experience at these stations. Our customers have told us that their fast-charging experience would be improved if ride-sharing drivers had access to dedicated-charging infrastructure.

Given the goals that California has for electrifying ride share, the service that TNC EV drivers provide to the public, and the necessity for expanded infrastructure dedicated to these drivers, EVgo respectfully requests that

[1]http://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/About_Us/Organization/Divisions/Policy_and_Planning/PPD_Work/PPD_Work_Products_(2014_forward)/Electrifying%20the%20Ride%20Sourcing%20Sector.pdf

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CARB staff consider altering public access requirements within the proposed LCFS modifications to unlock opportunities for TNC drivers.

Programs like LCFS are critical to meeting the goals laid out by the Governor in his Executive Order, calling for five million ZEVs in California by 2030 and 250,000 electric vehicle chargers, including 10,000 direct current fast chargers, by 2025. EVgo thanks CARB staff for the opportunity to provide input on this rulemaking, and please do not hesitate to contact us if we can answer any additional questions or be of further assistance.

Sincerely,

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