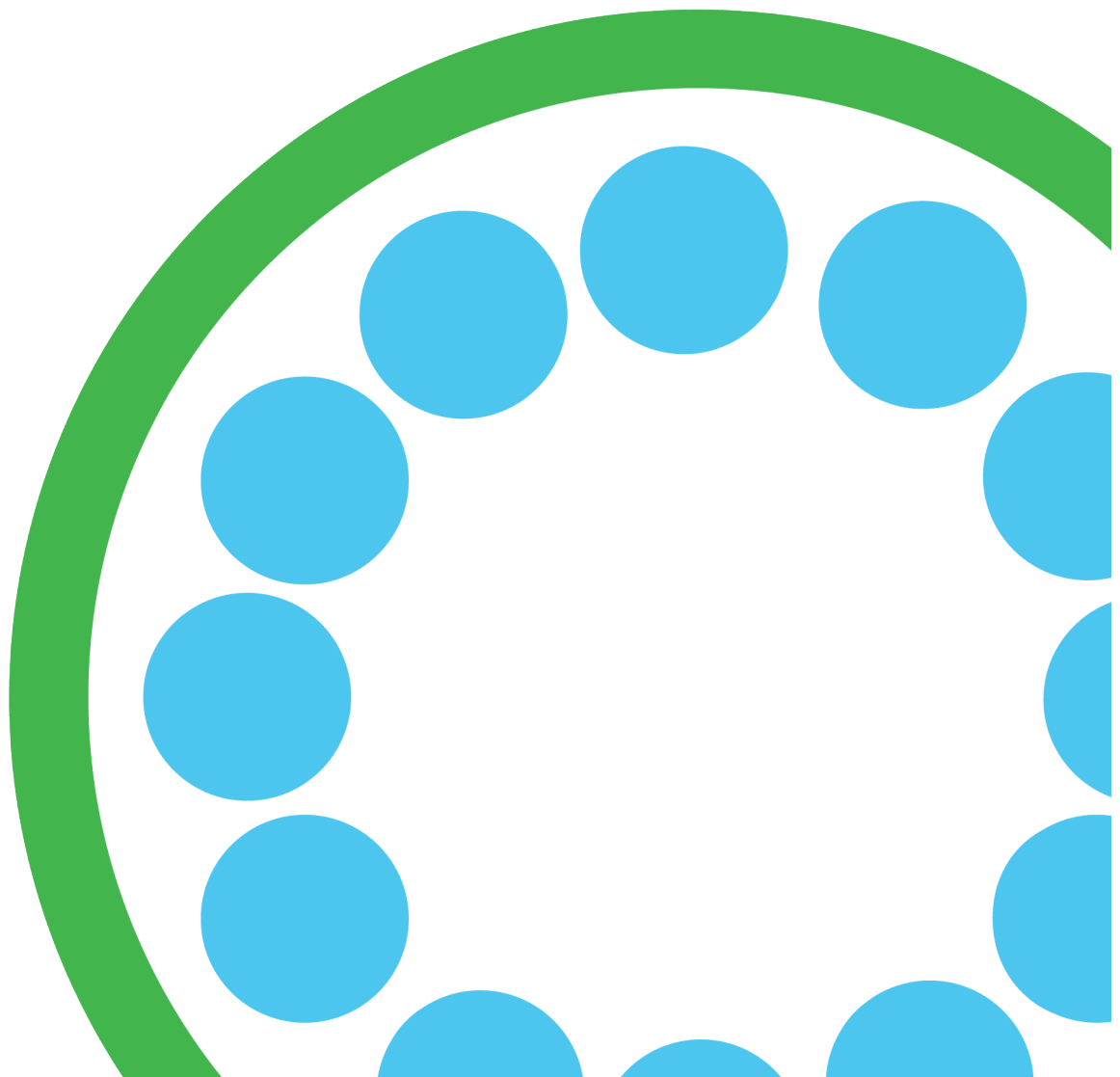




EV-Box support letter for rapid approval and start of EA California ZEV investment plan.





Date: July 13, 2017

Mary D. Nichols
California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

Re: Support for rapid consideration and quick approval of the Cycle 1 CA ZEV Investment Plan

Dear Chair Nichols:

EV-Box North America INC has with 48,000 the largest installed base of EV infrastructure worldwide. Originally started in the Netherlands, we now have offices in 7 countries, charging stations in 27 and over 850 cities worldwide no enjoy an EV charging experience from EV-Box.

Our global experience learns that high ratio of infrastructure to vehicles leads to the highest adoption of Electric Vehicles. In the Netherlands (2nd highest per capita EV in the world) we see a ratio of 1 charger for every 4 vehicles, while in California it is 1 to 17.

Now with long range medium price vehicles coming to market we need a sustained investment in EV infrastructure to keep the momentum to a clean energy future going.

At EV-Box we see the growth of the market and we recently opened an office in Downtown LA to be an active part of the market. We are positive towards Electrify America's California Zero Emission Vehicle Investment Plan and strongly urges CARB to approve it as soon as possible.



As you know, *EV-Box North America* has previously registered our support for expeditious implementation of Electrify America's CA ZEV investment plan as part of a letter to you from several California EV charging services companies (see appendix). In response to your May 24th letter requesting clarification Electrify America has supplemented its investment plan. We would like to take this opportunity to comment further on the plan as supplemented and reinforce our strong belief that these investments are critical to California meeting its EV deployment goals and will bring needed investment to communities across the state. We hope you will allow the process to move forward quickly.

Without infrastructure people will never start driving their electric vehicle comfortably around. The supporting infrastructure is likely to be the biggest barrier to California reaching its goal 1.5 million ZEVs on the road by 2025. Thus, helping the state reduce its dependence on foreign oil, and helping consumers save money at the pump, while dramatically reducing smog and greenhouse gas emissions that endanger the health and welfare of Californians is a goal we all support.

The \$800 million being spent is not enough to meet all the needs but is a substantial down payment that will encourage further investment and set the State on course for generating thousands of new jobs. Already with EV-Box we currently hire 5FTE and have plans to grow that to 15 in California by end of year. We are also looking into assembling our charging stations in California as that will greatly reduce our fulfillment time and we can scale quicker. Beyond EV-Box, the EV America investment alone is estimated to support up to 8,500 jobs over the 10 year course of the investment.

We looked carefully into the Electrify America supplement and feel that it addresses the concerns of CARB and the California legislator and we want to push forward. Stalling the investment is hampering EV growth, without infrastructure people won't buy an EV, site-hosts want certainty on the investment plan so that they can make a purchase decision. We already experience it in our contacts with site-hosts that the lack of clarity makes them wait on when and how many EV chargers they want to purchase.

CARB's request and Legislature interest helped focus Electrify America's efforts in its supplement to make investments that supply a much needed benefit to all Californians, including low and moderate income residents, and those who live in disadvantaged communities. As private companies operating in the sector, we certainly understand that there needs to be a business case for all investments, but we were pleased to see the



Supplement recognize that there is a business case for a substantial investment in those communities and we are committed to help work with EA to find opportunities to invest in low and moderate income communities.

We are pleased Electrify America added the Fresno metro area as a focus for community charging investments, developed an education and outreach proposal targeted at the unique barriers to ZEV use in low-income and disadvantaged communities, and presented a new strategy to explore the use of more affordable pre-owned ZEVs. Additionally, we support Electrify America's investment in Sacramento and the CARB priority communities there as part of Electrify America's Green City Initiative. One of our team members is active on the board of the San Fernando Valley, where Fresno is a part of and we expect to grow our presence in that region not only with EV chargers, but also with out-reach and community campaigns.

CA is in danger of falling behind because EPA has approved EA's investment plan several months ago and EA already deploying in other states - (DC, MD, VA) while other countries are making substantial investments and pushing policies intended to lure EV producers to prioritize their markets. We have seen this from experience in the Netherlands, where a change in tax policy almost completely halted the purchase of Electric Vehicles and where it is now difficult for people in the Netherlands to get a full electric EV as carmakers have stopped prioritizing sending EV to the Dutch market.

Additionally there is also the risk of electric vehicles that are leased in California that will come of their lease and will be sold and sent to other places in the US. The first generation of EVs that is now coming of the lease have a lower range. The people buying these EV are more general customers than the initial EV buyer and need more charging stations so that they drive around comfortably. Without infrastructure these vehicles will move out of state and it will be more difficult to meet the carbon reduction goals in California.

EV-Box supports expeditious approval of the EV America plan, as supplemented, because we firmly believe it is in the best interest of California environment and economy, our business, and people in disadvantaged communities across the state.



A handwritten signature in black ink, located below the logo.

Tim Kreukniet
VP Business Development and Policy



APPENDIX



April 11, 2017

Mary D. Nichols
California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

Dear Chair Nichols,

The Volkswagen (VW) settlement decree represents a unique opportunity to accelerate the electric vehicle (EV) market in California. Expanding this market will create jobs and new economic opportunity, help California achieve its climate mitigation goals, and protect the health of disadvantaged communities who face the worst effects of tailpipe pollution. We urge CARB and the other parties to implement the requirements of the existing settlement as soon as possible.

This letter is signed by companies representing the full breadth of the EV charging industry, including EV Supply Equipment (EVSE) manufacturers, installers, technology providers, and users. We are concerned that the full perspective of the EV charging industry has not been well communicated to policy makers and other stakeholders so far on this issue. Our companies are committed to competition and understand how the California ZEV Investment Plan, as it is currently written, will be beneficial to the public and the industry.

As you know, Appendix C of the settlement decree establishes the California ZEV Investment Plan, which requires VW to invest \$800 million in California over the next



ten years. We applaud CARB for securing this requirement as part of the settlement agreement. Along with the rest of the settlement, we believe that Appendix C is an effective mechanism to hold VW accountable for its actions, while also achieving important public benefits.

In particular, we believe the provisions of the existing settlement have the following benefits:

- **Enables California's Transportation Policy Goals:** Many of California's landmark transportation policies (tailpipe emissions standards, the ZEV mandate, and the LCFS) require or benefit from expanded deployment of EVs and other ZEVs. That need is reflected in California's current target to put 1.5 million ZEVs on the road by 2025. The VW settlement will help enable all of these policies by expanding access to public charging to reduce range anxiety at a critical point when many mass-market EVs are starting to enter the market. By enabling California's transportation policy framework, the settlement will help deliver broader consumer and public health benefits for all California residents.
- **Requires Broad Geographic Deployment:** The settlement requires VW to make investments across a variety of cities, metro areas, and types of locations, such as workplace, multi-family, and other public locations. This will ensure maximum access for existing and future EV drivers, including high speed charging on highways and public chargers in workplaces, multi-family dwellings, and community settings, such as grocery stores and shopping malls.
- **Expands Access to Public Charging Infrastructure:** VW has stated its commitment to installing public DC-fast charging and Level II charging as part of the ZEV Investment Commitment. Range-anxiety is still a major adoption barrier for consumers and expanding public charging infrastructure is a critical step to addressing this concern. Further, the settlement specifically prohibits eligible investments at or adjacent to VW dealerships.
- **Supports Disadvantaged and Low-Income Communities:** In addition to requiring a broad geographic and site distribution (e.g. multi-unit housing) of charging infrastructure, the settlement directs VW to make investments that will benefit disadvantaged communities in two ways. First, it encourages EV charging infrastructure for heavy-duty trucks, freight transport and transit, which are a major source of diesel air pollution that disproportionately affects disadvantaged communities. Second, it encourages wider access to EVs by directing investments at programs that increase public access to ZEVs through car-sharing, ride-hailing services and other mechanisms to allow low-income customers to acquire a ZEV.



- **Creates Jobs:** The California ZEV Investment Plan will result in exponential expansion of electric vehicle infrastructure well beyond the existing approved deployments. This will create good-paying jobs throughout California in construction, electric utilities, system installation, system operations, and maintenance.
- **Ensures Appropriate State Oversight of VW's Investment Plans:** Under the terms of the settlement decree, CARB must review VW's 30-month investment plans. It then has the discretion to approve or disapprove specific elements of the plan to ensure compliance with the requirements of the settlement decree. This ensures that the State will have an appropriate oversight role while still providing the market certainty and efficiency necessary for market participants to support these investments.
- **Requires Technology-Neutral, Non-Proprietary Standards:** The settlement requires VW to install EV charging infrastructure that supports multiple, non-proprietary connectors, open network communication protocols, and charging protocols that anticipate the evolving field of EV charging. As an example, VW has stated that it will support all broadly accepted standards for Level II and DC-fast charging. This includes supporting CHAdeMO DC-fast charging connectors, even though VW does not plan to support CHAdeMO in its own vehicles.
- **Preserves Fair Competition:** VW has stated that it will work with multiple, qualified vendors to achieve the requirements of the California ZEV Investment Plan and it will make those decisions based on competitive processes.

California has always been a global leader in moving the automotive market towards a cleaner, more efficient future. The VW settlement represents another unique moment for California to push forward and jumpstart broad adoption of EVs and other ZEVs. We are concerned that some have raised objections and proposed delays to implementing the settlement. We firmly believe that our state, our industry, and our planet, cannot afford any unnecessary delay and we urge you to move forward as quickly as possible under the existing terms of Appendix C and require VW to fulfill its obligations under the current California ZEV Investment Plan.

Brett Hauser
Chief Executive Officer
Greenlots

Frank Meza
Chief Executive Officer
BTC Power Inc.

Mike Anderson
Chief Executive Officer
Efacec USA, Inc.



Dave Schembri
Chief Executive Officer
EVgo

Mahi Reddy
Chief Executive Officer
SemaConnect

Kenneth Karklin
Vice President and General Manager
Efficient Energy Systems,
Aerovironment Inc.

Kristof Vereenooghe
Chief Executive Officer
EV-Box



We are EV-Box.

EV-Box was founded in 2010, when the market for electric vehicles (EVs) was still in its infancy. Our founders set their hearts and eyes on a clear concept: a fully modular charging station that enables easy installation, maintenance and upgrades, and above all, uncompromising quality and reliability.

Soon, EV-Box became an international market leader in Electric Vehicle Supply Equipment (EVSE) and related cloud-based services. With an installed base of over +40,000 charging points across more than 840 cities worldwide today, EV-Box now serves electric drivers, businesses, facilities and major public charging networks including Amsterdam, the global role model city of urban e-mobility.

EV-Box is unique in fusing hardware and software into an All-in-One Charging Solution to ensure an optimal charging experience and an energy-efficient operation.

EV-Box accelerates the sustainable mobility rEVolution with safe, smart and connected EV Charging, everywhere you go.



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Learn more about electric driving and EV charging at ev-box.com