



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

Re: Electrify America's Cycle 2 ZEV Investment Plan

Dear Mr. Williams –

Environmental Defense Fund (EDF) submits the following letter in support of Electrify America's Cycle 2 ZEV Investment Plan. In general, EDF believes Electrify America's plan represents a comprehensive, well-thought out road map for installation of infrastructure for the passenger vehicle market. We appreciate the clear measures designed to speak to a variety of stakeholder concerns. In particular, EDF would like to recognize Electrify America's inclusion of the following important issues:

- An emphasis on customer education, particularly in rural and disadvantaged communities that may have limited access to these vehicles, but are more likely to suffer ill impacts from air pollution;
- The intention to design energy rates specific to direct current fast chargers (DCFCs), which is important, given their potential to cause spikes in energy demand;
- A plan to have renewably powered energy stations as well as associated batteries at certain stations in order to shave peak demand;
- Coordination with utilities to facilitate demand response programs; and
- Encouraging sub-vendors to hire diverse suppliers.

While EDF encourages the California Air Resources Board (CARB) to adopt this investment plan as a way to install increased amounts of infrastructure and thus drive electric vehicle uptake, there are certain considerations we feel should be made in the near future:

- 1) There should be an increased focus on medium and heavy-duty vehicles – as a substantial part of harmful pollution in the state, there is a need to look beyond electrifying the light duty sector. As such, infrastructure installed with the aim of supporting the medium and heavy-duty sectors should be part of Electrify America's approach.
- 2) EDF urges Electrify America and CARB to work with utilities and the California Public Utilities Commission to develop rates that integrate renewable energy, incentivize charging at times that are beneficial to the environment and the grid, and preserve fuel cost savings.
- 3) Finally, though there is an emphasis on DCFCs, even in the residential context, EDF believes the efficacy of DCFCs in that context should be carefully considered. In many situations, a Level 2 charging station meets residential charging needs, and comes at a lower cost – effectively allowing Electrify America to deploy more charging stations for the same amount of money. Therefore, more information about charging needs should be gathered before allocating too much funding on DCFCs in residences – when that money might be better spent on more cost-effective Level 2 charging stations.

EDF thanks Electrify American and CARB in advance for their consideration and asks that the Cycle 2 investment plan be adopted, taking into account the considerations outlined above.

Respectfully submitted,

A handwritten signature in cursive script that reads "Larissa Koehler".

Larissa Koehler
Senior Attorney
Environmental Defense Fund

A handwritten signature in cursive script that reads "Lauren Navarro".

/s/ Lauren Navarro

Lauren Navarro
Senior Policy Manager
Environmental Defense Fund