

7/12/2017

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

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

Dear Chair Nichols:

**ABM**, as one of California's largest employers with over 20,000 employees, supports Electrify America's California Zero Emission Vehicle Investment Plan and strongly urges CARB to approve it as soon as possible.

**ABM** was founded in 1909 in San Francisco and has over 108 years of providing facility management and upgrade services, and is also one of the largest EVSE, EV site host, supply and installation companies, with a unique position in the industry as both a provider of EV Charging to our clients and an installation/service partner to vendors such as EA.

**ABM** has been a longtime VW Vendor in the US and Canada, currently mobilized on the VW Canadian public and dealership programs. ABM performed Site Identification, Acquisition, Validation and Installation services for the VW-BMW DC Fast Charger corridor program resulting in construction of approximately 100 locations in several states to complete corridors from Boston to New York and San Diego to Portland. ABM is also currently under contract with PORSCHE North America & BMW-National Parks DC Charging programs, have successfully completed AC & DC Charging programs for the CEC, California DGS, VW, BMW, eVgo, MINI, HONDA, NISSAN and other OEM auto manufacturers with approximately 20,000 ports installed to date.

We believe that our history and experience lend credibility to our request regarding support of this matter being considered.

**ABM** previously registered our support for expeditious implementation of Electrify America's CA ZEV investment plan with 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.

**ABM** continues to support the plan originally accepted by CARB because it is what is needed to promote desperately needed EV Charging infrastructure in the market place.

ABM has seen firsthand what a well targeted EV Charging program can do to promote the adoption and purchase of Electric Vehicles by drivers as they see that charging has become available to them.

**What we know:**

- Lack of support for (Turn Key) infrastructure programs is likely to be the biggest barrier to California reaching its goal 1.5 million ZEVs on the road by 2025.
- Incentive, Rebate programs for EV Charging Equipment are not as effective as programs that provide a holistic solution that addresses everything needed to provide EV Charging Station's where the drivers need them.
- 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, many of them in Disadvantaged Communities. The EV America investment alone is estimated to support up to 8,500 jobs over the 10-year course of the investment.
- ABM has many employees that live and work in Disadvantaged Communities, these employees rely on programs like the EA approved plan for work. ABM also utilizes MBE, WBE as sub-contractors.

**Why ABM supports the recent supplement:**

- ABM has many offices operating in low and moderate income including disadvantaged communities, and employ people in these communities that will benefit from the recent supplement. 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 also work in disadvantaged communities. 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.
- We support Electrify America's investment in Sacramento and the CARB priority communities there as part of Electrify America's Green City Initiative.

### Why **ABM** supports expeditious approval and the consequences of delay

- California as one of the OEM's biggest market could take a back seat to other states that have already approved EA's plan. The EPA has approved EA's investment plan and EA already deploying in other states - (DC, MD, VA).
- Other countries are aggressively approving policies intended to promote eMobility and lure EV producers to prioritize their markets. (France, UK) etc.
- OEMs must prioritize for their biggest markets. Market leaders have been in California to date because the state has been so aggressively in front with policy and investments, California could be a difficult politicized un attractive market to focus on.
- Investment in supporting charging infrastructure will be a key factor in consumer adoption and rapidly expanding markets. California should not risk falling behind.

### Conclusion

ABM supports the 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.

Sincerely,



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## 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.

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.

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