**Steve Henderson**
Electrification Policy & Projects
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October 26, 2018

The Honorable Mary Nichols
Chairwoman, California Air Resources Board
c/o Mr. Mark Williams, Mailstop 3E
P.O. Box 2815
Sacramento, California 95812

**RE: Comments in Support of Electrify America LLC's Cycle 2 California Zero Emission Vehicle (ZEV) Investment Plan**

Dear Chairwoman Nichols,

Ford Motor Company (Ford) respectfully submits the following comments in support of Electrify America LLC's Cycle 2 California ZEV Investment Plan.

As outlined by Appendix C of the 2.0-Liter Partial Consent Decree, Electrify America will invest $2 billion in zero emission vehicle infrastructure, education, and access efforts over the course of a decade, enabling millions of Americans to discover the benefits of electric driving with the added goal of increasing overall ZEV adoption across the United States. $800 million of this investment will be made in California.

Ford has committed to deliver on CO2 reductions consistent with the Paris Climate Accord, and vehicle electrification is core to Ford's business. These plans include investing $11 billion to put hybrid and fully electric vehicle models on the road globally by 2022. In the next few years, Ford will offer full battery-electric vehicles and hybrid options on well-known nameplates such as Mustang and F-150 in addition to hybrid or plug-in hybrid options for every new Ford SUV introduced.

Ford electric vehicles will be inspired by our most iconic products, like the Mustang and our utility line-up, amplifying the best attributes that our customers love, such as performance, capability and convenience, combined with an ecosystem of services that will make the transition to an EV lifestyle easy. Ford's electric vehicle strategy rethinks the ownership experience, including an effortless vehicle charging experience both at home and on the road. Charging infrastructure remains a major challenge to electric vehicle adoption, including the cost of residential charging hardware and installation plus the significant shortfall in publically available chargers. For these reasons, Ford supports Electrify America's charging infrastructure plans in California.

In addition, the Electric Power Research Institute (EPRI) and a number of automakers, including Ford, are developing an integrated platform that automotive manufacturers can use to support utility demand response requests for grid electric power stability. This common platform, facilitating communications between utilities, automakers and EV networks, would simplify the demand-response request process for EVs across the United

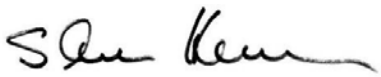
States. Therefore, instead of developing an all-new platform, Ford encourages Electrify America to use the Open Vehicle-Grid Integration Platform (OVGIP) as the means of communication between home chargers and utilities to support demand response requests.

Electrify America's investment in charging infrastructure is unprecedented and will benefit all EV drivers, including those who choose Ford vehicles. Their commitment to a non-proprietary, high-powered, and open network will positively support the electric vehicle driver of both today and tomorrow in communities across California.

In closing, Ford Motor Company looks forward to the California Air Resources Board's timely and positive approval of Electrify America's Cycle 2 ZEV Investment Plan so this tremendous opportunity to support ZEV infrastructure investment continues unabated in the State of California.

Thank you for considering these comments. If you have any questions, please feel free to contact me at shenders@ford.com, or at (313) 322-4475.

Sincerely,



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