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May 21, 2018

Lisa Williams
California Air Resources Board, Mailstop 5B
P.O. Box 2815
Sacramento, CA 95812

RE: Comments on Proposed Beneficiary Mitigation Plan for the Volkswagen Environmental Mitigation Trust

Dear Ms. Williams,

Thank you for the opportunity to provide comments on the Proposed Beneficiary Mitigation Plan for California's Allocation of the Volkswagen Environmental Mitigation Trust released on April 20, 2018. The \$423M that California will receive represents a significant opportunity to make investments into zero emission vehicles and charging infrastructure, while mitigating the excess NOx emissions caused by Volkswagen's harmful actions.

ChargePoint is very supportive of CARB's focus on zero-emission technologies for transit, school, and shuttle buses; class 8 freight and port drayage trucks; and freight and marine projects. A zero-emission focus is consistent with state priorities, will help commercialize these technologies and vehicle types, and will result in significant emission reductions.

ChargePoint respectfully requests the reconsideration of allocating just 2% out of the allowable 15% towards light-duty ZEV infrastructure. We support the recognition from CARB staff that "additional funding will be needed as part of a broader long-term effort to fully meet growing demand", and we believe that the Volkswagen Environmental Mitigation Trust funds presents an excellent opportunity to make additional investments in ZEV infrastructure. The more than \$63M that CARB could allocate towards ZEV infrastructure, plus the private capital that would be matched to this funding, could help achieve Governor Brown's Executive Order B-48-18 to put 250,000 EV chargers in the ground by 2025.

When it comes to deploying the funds specifically for EV charging stations, we encourage CARB to consider utilizing the California Electric Vehicle Infrastructure Project ([CALeVIP](#)), implemented by the Center for Sustainable Energy for the California Energy Commission. CALeVIP was designed to be able to separately track and manage different projects and funding sources. Utilizing this framework would allow CARB to target incentives to areas not currently served by current and planned infrastructure investments, and to quickly and efficiently deploy funds without additional administrative burden for CARB and vendors/contractors needing to respond to competitive solicitations.

ChargePoint fully supports CARB's goal to ensure that at least 50% of the funds for EV charging infrastructure go to projects that benefit disadvantaged or low-income communities. We believe this can simply be accomplished by utilizing the framework established for CALeVIP, and point to their first

incentive project, the Fresno County Incentive Project ([FCIP](#)), as an example of how to deploy funds, and in this example exclusively targeting a disadvantaged community.

ChargePoint respects and appreciates the difficult decisions that CARB must make when it comes to allocating Environmental Mitigation Trust funds, and balancing the interests of many stakeholders with state priorities. We appreciate your time and consideration of our comments. If you have any questions, please contact me at john.schott@chargepoint.com or (669) 237-3406.

Sincerely,

A handwritten signature in blue ink that reads "John Schott". The signature is written in a cursive style with a large initial "J" and a stylized "S".

John Schott
Grant Operations
John.Schott@ChargePoint.com