

October 26, 2018

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments on Electrify America's proposed Cycle 2 ZEV Investment Plan

Thank you for the opportunity to provide comments on Electrify America's proposed Cycle 2 ZEV Investment Plan. The Electric Vehicle Charging Association (EVCA) sees this as an opportunity for the California Air Resources Board (CARB) to ensure that Volkswagen's investments align with the intent and implementation of California's objectives and policies governing EV investments, which uphold an approach favoring continuing innovation, promotion of a competitive marketplace, and complementary – not duplicative investments.

EVCA is a not-for-profit trade organization representing the diverse interests, and collective experience and expertise of electric vehicle service providers, equipment manufacturers, installation and maintenance providers, and others in the EV charging space. Our members include ABM, Chargepoint, BTCPower, Clean Fuel Connection, Envision Solar, EVBox, EV Connect, EVgo, SemaConnect and Volta. EVCA's mission is to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the expeditious and efficient adoption of EVs and deployment of EV charging infrastructure.

EVCA believes the investments should:

- **Promote collaboration** with the private sector, utilities, state agencies, site hosts, drivers and other stakeholders to ensure that investments are well-coordinated.
- **Leverage innovation and competition and provide customers with choices** to improve the EV charging experience for drivers and make it accessible and affordable to all.
- **Support expeditious deployment** with a goal of reducing regulatory barriers generally.
- **Promote innovative, sustainable models** so that multiple sources of potential funding, such as other private and public sector investments, are maximized and infrastructure can be maintained and updated in the long-term, with the objective of effective and maximum adoption of electric transport, and reduction of harmful emissions.

To that end, we have some specific comments, concerns and recommendations to ensure that Electrify America's proposed \$200M Cycle 2 ZEV Investment Plan is implemented in a manner that does not duplicate existing efforts or frustrate other critical state policy objectives, such as avoiding harm to the competitive market or overlooking underserved communities.

1. Metro/Community Charging (Proposed \$95M - \$115M)

Metro/community charging is the most commercially viable segment of the EV charging market right now. Electrify America's Cycle 1 investments have already created a disruption in the marketplace that have led to increased costs for EVSE providers and in some cases, broken contracts as Electrify America has looked to secure sites already under contracts with other providers.

Additionally, Electrify America investments are meant to be complementary. However, there is already both public and private investment in metro/community charging and a thriving, innovative economy. EVCA recommends that CARB reviews metro/community charging site selections to ensure they are not damaging competition. Moreover, we recommend that CARB evaluates Electrify America sites for potential impacts on other public funding opportunities, as the regions that Electrify America is planning to serve are already being incentivized through both state and utility programs. As an example, several of the metro areas that Electrify America proposes to serve are also regions that the Energy Commission is prioritizing for CalEVIP. Our members are concerned that this will have the same distorting effect in the marketplace that providers have already experienced under current state funded programs.

The Cycle 2 investment provides a tremendous opportunity to truly electrify all communities in California, and we strongly recommend focusing these resources in lower density metropolitan areas where investments are still direly needed. This would be a more beneficial use of resources and a way to reach communities that are not being served by private investment.

2. Highway and Regional Routes (Proposed \$25M - \$30M)

EVCA members have observed during Cycle 1 that Electrify America has been offering above market value to site hosts and tying up sites without installing charging stations in critical transportation corridors. This has been impacting other companies' ability to secure sites and causing delays in fulfilling the California Energy Commission (EV) charging corridor grants. EVCA respectfully requests that CARB limits Electrify America to only leasing property up to three months prior to installing stations, and providing more transparency about sites that Electrify America has served on the CARB website. We recommend that these investments be targeted to corridors that are not already seeing widespread charging infrastructure deployment in an effort to expand charging availability throughout all regions of the state.

3. Residential (Proposed \$8-\$12M)

Residential charging stations are readily available. EV drivers may even order them on Amazon, and they generally cost \$500 or less to purchase. The California Public Utilities Commission also recently approved with modification a proposal from SDG&E to provide rebates for home charging stations. It is unclear what need Electrify America is serving or how single family private residential charging aligns with the goals of the consent decree. These resources could be better spent meeting the needs of multi-family dwellings, particularly in lower income and rural communities in the state.

4. Station Utilization (Proposed \$10M)

Electrify America indicates in its proposal that it will use settlement funds to pay for memberships to their charging stations. This is anti-competitive and no other company in the industry can employ this business model. We recommend these resources be reallocated to further investments in rural communities and brand neutral education.

5. Education (Proposed \$17M)

Education efforts should be focused on brand neutral campaigns and coordination, and support of Veloz and similar organizations for public awareness.

If executed with modifications and proper oversight from CARB, Electrify America's Cycle 2 investment will provide a tremendous opportunity to dramatically increase the amount of EV infrastructure available to all Californians. EVCA is grateful to CARB for considering our recommendations and comments. Please consider EVCA as a resource for insight into both the EV charging industry and the broader EV industry. We offer continuing partnership to make EVs the vehicle of choice for Californians while delivering an innovative, clean, sustainable transportation future, and a robust local industry.

Sincerely,



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