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March 20, 2017

The Honorable Mary Nichols
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: ZEV Regulation Midterm Review (MTR)

Dear Chairman Nichols,

ChargePoint is pleased to provide written comments in support of the staff recommendations made in the Midterm Review of the ZEV Regulation, including continuing the current regulation as well as setting new targets for beyond 2025.

ChargePoint is the world's largest and most open EV charging network with more than 33,500 Level 2 EV and DC fast charging spots, including 18,453 public and private ports in California as of March 2017. ChargePoint's network includes more than 6,500 charging station owners, including major employers, municipalities, universities, utilities, real estate developers, and parking garage facility owners and operators that provide EV charging and related services to EV drivers. ChargePoint's real-time network information, including the availability of charging locations throughout the nation, is available through the ChargePoint mobile app, online, and via the navigation systems in top-selling EVs. Every four seconds, a driver connects to a ChargePoint station and by initiating over 22 million charging sessions, ChargePoint drivers have saved over 21.9 million gallons of gasoline and driven 525 million gas free miles.

1. Continue on the current path through 2025.

CARB staff's recommendation, aligned with the Final Determination signed on January 12, 2017, by EPA, confirms that the federal GHG vehicle standards for the 2022-2025 model years are appropriate. Continuing on the current path towards 2025 will create regulatory stability that is important for automakers. Likewise, stability extends to the EV charging industry, which uses predictions of ZEV sales to work with our investors on establishing budgets and targets for infrastructure deployment. As staff notes in its report, "Given the market uncertainties that still exist in these early years, regulatory stability of the 2018 through 2025 model year standards can help ensure a continued path of increasing, but achievable, ZEV volumes."¹

2. Ramp down the Travel Provision.

In addition to maintaining the current regulation, ChargePoint supports continuing with the plan to ramp down the travel provision starting in 2018. Phasing out BEVs from this provision is necessary

¹ ES-7.



to achieve more direct sales in the nine Section 177 states. Ensuring the phasing of the travel provision will encourage growth of ZEVs – and charging infrastructure - beyond California.

3. Work with stakeholders to set new targets for beyond 2025.

Staff found that in order to meet state GHG targets, an additional three million ZEVs and PHEVs will be needed in 2026 through 2030. Staff therefore recommends that California take steps now to set new credit requirements for the next phase of the ZEV regulation. ChargePoint supports continuing the ZEV regulation beyond 2025 and encourages CARB to work with automakers, charging infrastructure providers, and other stakeholders to set ambitious yet achievable goals for beyond 2025.

4. Set a state goal for charging infrastructure.

Staff notes throughout its report that charging infrastructure is vital to consumer decision making on whether or not to adopt a ZEV. ChargePoint therefore encourages the state to set a goal for charging infrastructure. This will help appropriately size state funding programs, utility investments, and private sector targets for deploying enough charging stations to support the ZEV goal for 2025 and the future goal for beyond that year. ChargePoint recommends that this state goal be either one public charging station for every 5 ZEVs on the road by 2025 or establishing a per mile goal of at least one public charging station every 30 miles across the state by 2030.

5. Support ZEV adoption in disadvantaged communities.

While ZEV adoption is growing statewide, more action is still needed to penetrate underserved and disadvantaged communities. CARB should coordinate with other state agencies, policymakers, and other stakeholders to identify programs and policies needed to remove barriers to ZEV adoption in these communities, including consumer rebates, credit enhancement, funding for charging infrastructure, ride-sharing, and others.

ChargePoint appreciates the opportunity to provide these comments. The ZEV regulation has been vital to the growth of our industry and we are pleased to see staff reporting in this MTR that California is on the path to success by 2025. We look forward to working with CARB, automakers, and other stakeholders to keep the momentum going.

Sincerely,

A handwritten signature in black ink that reads "Anne Smart". The signature is written in a cursive, flowing style.

Anne Smart
Vice President, Public Policy
ChargePoint
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