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**Comments of innogy eMobility US and Broadband Telecom Power, LLC**

**Volkswagen California ZEV Investment Plan Cycle 2**

**California Air Resources Board**

*Submitted October 26, 2018*

Thank you for the opportunity to comment on the supplemental filing in re: Volkswagen’s (VW) zero emission vehicle (ZEV) investment plan. As a global charging technology leader, innogy continues to believe that any and all additional funding for charging infrastructure is welcome and important to help make electric vehicle (EV) adoption accessible for more Californians. Billions of dollars are needed to add new infrastructure and to upgrade the existing EV charging infrastructure in California. A large injection of additional capital into ZEV infrastructure is necessary and beneficial for California drivers, EV deployments, and existing charging industry participants. Accordingly, we have been supportive of the infrastructure investments planned under the VW 2.0 liter settlement, as we have of the investments of any automaker looking to tackle EV infrastructure.

Electrify America’s Cycle 2 Investment Plan is an important step in realizing California’s transportation electrification goals. Below are innogy and BTCP’s comments for the record. The plan represents investments that 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 and are available to ARB members and staff if there are any questions we can help answer.

**The Cycle 2 Plan’s High Power, Public Fast Charging Network Promotes EV Adoption**

Availability of charging is a critical factor in a consumer’s willingness to purchase an EV, and particularly for residents of multi-unit dwellings, rural communities and/or those that cannot afford to install home chargers, that means that public fast charging is virtually necessary to enable EV ownership. California’s existing community charging networks need a significant upgrade to meet the market need from new EVs with high-capacity battery packs. New long-range EVs hitting the market, like the Tesla Model 3, Chevy Bolt, Nissan Leaf, Ford, Audi, Porsche, Karma, Volvo, Jaguar, BMW and others, are taxing the existing EV charging stations. While the majority of today’s vehicles require 30 minutes to reach a near-full charge on the dominant public fast chargers in the field (50kW), the long-range EVs will require 60 to 90 minutes. As a result, drivers will spend more time on the chargers already installed, and congestion will ensue. It is critical to increase charging speeds to High-Power, as proposed in the Cycle 1 Plan, in order to reduce charge times and relieve congestion.

**The Cycle 2 Plan Needs to Move Forward Quickly to Promote Sales**

This is a critical time for the EV sector, and it is important to continue to move quickly to resolve ambiguities that slow market development. As the aforementioned longer-range EV models come to market at lower price points, EVs become an option for more drivers. The infrastructure needs to be built in order to translate that option into a purchase. innogy’s experience developing charging solutions in Europe paved the way for drivers and charging infrastructure companies and demonstrated that infrastructure will cause sales of EVs. innogy and BTCP recommend deploying settlement resources quickly, efficiently, and responsibly to overcome infrastructure barriers to EV adoption.

A great deal of additional private investment is waiting on approval of the EA plan, and the sector needs to move quickly if it is to achieve its ambitious objectives. Added charging infrastructure enabled through Cycle 2 will help increase EV sales and attract additional private capital to produce a ‘rising tide’ for all the industry participants and accelerating California toward its EV goals.

**The Cycle 2 Plan Should Prioritize EV Infrastructure Installation**

The Volkswagen investment will be a significant down payment on the comprehensive network required to make ubiquitous EV deployments a reality. The EV charging industry has a strong and growing set of companies that stands ready and able to execute on the needs of Volkswagen as they look to deploy. The infrastructure that goes into the ground and the funds to assure its continued operation are the most valuable of all the settlement dollars. innogy and BTCP recommend prioritizing those investments.

Assurances that the infrastructure investments are additive to other planned investments in California is important. This means cooperating to enable other networks to flourish, and allowing the Electrify America investment to be the backbone of our equitable, efficient charging infrastructure. innogy and BTCP shares ARB’s desire to make ZEV adoption realistic for Californians across income levels statewide.

Electrify America should not be required to include hydrogen fueling. If ARB believes hydrogen vehicles will emerge in the maker in volume, a set aside fund could be reserved for cycle 3 or 4, at which point the market direction will be clearer and California’s existing hydrogen investments can be augmented.

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