



October 26, 2018

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

**Re: Supporting Electrify America LLC's Cycle 2 California Zero Emission Vehicle (ZEV) Investment Plan**

Dear Chairwoman Nichols,

On behalf of Simon Property Group, I respectfully submit the following comments in support of Electrify America LLC's Cycle 2 California ZEV Investment Plan.

As we understand from a review of Appendix C of the 2.0-Liter Partial Consent Decree, Electrify America will invest \$2 billion in ZEV 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. Further, we understand that \$800 million of this investment will be made in California.

As a strategic alliance partner and site host, Simon has already begun to work with Electrify America to offer high-speed electric vehicle charging at our shopping centers across California. Our long term view is that the development and placement of these chargers at our sites is a net positive for our centers, for our shoppers, and for the communities that we serve.

Simon will host some of Electrify America's largest and highest-powered charging sites including San Francisco Premium Outlets, scheduled to open in 4Q 2018. Upon completion of Cycle 1, Simon expects to host approximately 100 Electrify America charging dispensers at 17 of our California shopping centers.

In addition, I want to express Simon's support of Electrify America's broader effort to increase the public's awareness of ZEVs through education, outreach and advertising.

In closing, Simon Property Group looks forward to the California Air Resources Board's timely and positive approval of Electrify America's Cycle 2 ZEV Investment Plan so that this unique opportunity to promote ZEV adoption may continue unabated across the State of California.

Kind regards,



Daniel Segal

Vice President, Business Development