



333 W El Camino Real, Suite 290 | Sunnyvale, CA 94087 | 1-844-474-SVCE (7823) | SVCleanEnergy.org

June 24, 2019

Mary D. Nichols
Chair, California Air Resources Board

1011 I. Street, P.O. Box 2415
Sacramento, CA 95814

Re: Docket EVSE201 – Electric Vehicle Supply Equipment (EVSE) Standards

Dear Chair Nichols:

Silicon Valley Clean Energy (SVCE), a CCA serving twelve cities and unincorporated Santa Clara County with carbon-free power, strongly supports CARB's work on transportation electrification. However, we respectfully request that the Proposed EVSE Standards ("Standards") under consideration on June 27th be amended to grandfather existing EVSE into the new payment method requirements.

Today's stock of EVSE represents the efforts of numerous public agencies and other early adopters who were deeply invested in helping California achieve its ambitious transportation electrification (TE) goals. Many of these charging stations were installed through one-time funding sources, such as state or regional grants, that will not cover retrofit costs to meet the new requirements. As written, the Standards will thus penalize early EVSE adopters in ways that run counter to achieving our state's TE goals. For those who can afford compliance, funds will be diverted to retrofits that could otherwise have gone to building new charging stations and improving overall EVSE coverage. For those who cannot, fear of noncompliance could result in removal of existing EVSE, actively *reducing* such coverage.

The proposed payment method requirements also fail to account for rapid evolution in payment technologies. There are already viable and popular alternatives to physical credit card readers on EVSE, including the ISO 15118 protocol favored by the California Energy Commission. Requiring extensive retrofitting of existing EVSE for a specific payment technology that may shortly be outdated is unlikely to be the most efficient use of the resources available for EVSE deployment.

TE is a top priority at SVCE. In December 2018 and February 2019, the SVCE Board approved collectively \$11 million for programs to directly and indirectly develop TE infrastructure and support TE market development. We strongly support CARB's efforts and goals in support of TE, but respectfully urge that grandfathering existing EVSE into the new payment method requirements would avoid punishing early EVSE supporters and, most importantly, maximize our rate of progress in this critical decarbonization area.

Sincerely,

A handwritten signature in blue ink that reads "Hilary Staver".

Hilary Staver
Manager of Regulatory and Legislative Affairs