

Jay Friedland
19-6-3

Public Comments of Plug In America
Re: EVSE Regulations 6/27/19

Good Morning Chair Nichols, ARB Board Members, and ARB staff, my name is Jay Friedland and I'm a senior policy advisor for Plug In America: we're a non-profit advocating for hundreds of thousands of EV drivers. I'm also representing a broad coalition which includes EV charger manufacturers, EV charging networks, Environmental groups, and Consumer organizations. And we speak for a broader group who want to become EV drivers, especially those in Disadvantaged Communities.

We were the sponsor of Senator Corbett's SB 454 in 2013. We have been working on this consumer protection issue for more than 7 years - and with ARB staff for the last two and they have tried hard to balance the concerns of all of the stakeholders. It's almost there.

Imagine if you pulled into a gas station and didn't know if it would take your credit card for payment or how much the fuel costs? And then in order to fuel you had to download an app, call an 800 number, or join a club to fill your car? SB 454 was created to make sure this *didn't* happen. Card readers are the most basic way to solve the issue of never leaving any driver stranded at a public charger. Consumers will buy more EVs if we eliminate this barrier and fueling is a familiar experience.

Our goal is to ensure consumer protections while striking a balance of cost considerations for EVSE deployment.

We have three core principles.

- 1) To ensure open and universal access to publicly available charging stations, especially given many of them were deployed with public funding.
- 2) To ensure that such open access takes into consideration the needs of Disadvantaged Communities, many of whom do not possess smart phones, credit cards, or bank accounts.
- 3) And to protect the existing investment California has made so far in building a public EV infrastructure.

We suggest changing the staff's proposed modifications to find the best compromise in terms of timing and preventing the issue from being relitigated again two years from now:

1. To protect existing infrastructure, eliminate the retrofit requirement on L2 chargers installed prior to January 1, 2022.
2. But retain the retrofit requirement for card readers on the less than a thousand publicly available L2 and DCFC chargers in Disadvantaged Communities (DAC).
3. For all L2 chargers, add a requirement that a toll-free number which accepts credit/debit/prepaid cards be available by January 1, 2020.

This simple set of fair regulations will *strengthen and increase* the size of the market by giving drivers the certainty of *actual open access*.

The opponents are promoting future technologies that are not yet available to all consumers. This just won't work, especially for those in disadvantaged communities buying thousands of used EVs where 25% of the people are unbanked or underbanked, or for the 23% of Californians who don't have smart phones... and all of us who can't always get a signal.

The regulation's opponents you'll hear from today want you to believe that the costs to add card readers will place an extreme burden on them and previous installations will be ripped out, but these numbers have been inflated out of proportion and the costs are modest, especially if you grandfather the existing L2 chargers other than those in Disadvantaged Communities. Taxpayers have *already* paid over \$100 million to these same charging companies. *Isn't* it reasonable to ask them to provide open access to every driver?

In summary, we believe that ARB should pass this regulation and accelerate the dates as much as possible. In order to send the strongest possible signal to the market, ARB should encourage incentives to reward early adoption of card readers prior to the implementation date, especially in Disadvantaged Communities,

via both internal ARB programs and working with other State agencies, like CEC and CPUC.

Let's give the public confidence to purchase and drive these great vehicles. That will enable the rapid expansion of a fair market for public EV charging.

Thank you for your consideration,

Jay Friedland
Plug In America