

October 26, 2018

The Honorable Mary Nichols
Chairwoman, California Air Resources Board
c/o Mr. Mark Williams, Mailstop 3E
P.O. Box 2815
Sacramento, California 95812

Reference: Comments in Support of Electrify America LLC's Cycle 2 California Zero Emission Vehicle (ZEV) Investment Plan

Dear Chairwoman Nichols,

ABB is pleased to submit comments to the California Air Resources Board in support of Electrify America LLC's Cycle 2 California Zero Emissions Vehicle Investment Plan (Plan), which will build on Cycle 1's investments in a diversified charging infrastructure that will meet the needs of all Californians.

ABB is a global electrification and automation leader and has been developing and deploying electric vehicle fast charging technology for nearly a decade. With 8,000 DC fast-chargers (DCFC) deployed worldwide, ABB has the largest installed base of high power EV chargers in the world. ABB is also the leading provider of power grid equipment worldwide.

California is home to 370 of our 24,000 US employees along with two important product groups, ABB Digital and ABB Wireless, which deliver the benefits of the industrial internet of things to customers, including EV charging infrastructure users.

ABB is proud of its work with Electrify America to remove a foundational barrier to transportation electrification across the US and here in California. ARB's timely approval of the Plan will continue the momentum and accelerate EV adoption throughout the state.

The Plan focuses on important barriers to EV adoption, including education and awareness, charging infrastructure for buses, chargers for metro communities, and grid integration. Importantly, the Plan emphasizes the needs of low-income and disadvantaged communities.

- **Education and Awareness**– One of the biggest hurdles to EV adoption is general awareness of how easy and cost-effective EV ownership can be. This is particularly true for disadvantaged communities. ABB is pleased to see Electrify America's significant focus on education and awareness.

- **Metro Communities-** The focus on metro communities fills a gap in DCFC and high-power charging, especially for EV owners who do not or cannot have charging at their apartments or multi-unit developments, or lack sufficient parking at their homes.
- **Buses and Shuttles-** Buses and shuttles present a significant de-carbonization opportunity. These vehicles are highly-utilized and often use diesel fuel. As such, electrifying a single buses or shuttle removes more emissions than electrifying a single automobile. Further, buses are relied on for transportation in lower-income and disadvantaged communities.
- **Grid support-** As the EV market grows exponentially in California, transportation electrification presents innovative opportunities for the electric grid as these are often controllable loads with shift-able flexibility. The proposal from Electrify America wisely emphasizes grid impact as an opportunity, through smart residential and demand response charging programs and renewable generation strategies.

The Plan's focus on deploying charging infrastructure to communities and driving awareness of the prevalence of chargers and benefits of EVs will make significant strides in promoting EV adoption in California. For these reasons, we welcome and support CARB's timely approval of Electrify America's Plan.

Respectfully,

Bob Stojanovic
Director, Electric Vehicle Infrastructure, North America
ABB Inc.