

Tony González
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**Statement of Electrify America at the California Air Resources Board Hearing
regarding Docket EVSE2019 – (Electric Vehicle Charging Stations Open
Access)**

Members of the Board,

I am Tony Gonzalez, and I am speaking today on behalf of Electrify America, LLC.

Electrify America is an electric vehicle (EV) charging provider investing \$800 million in California.

Electrify America has more than 120 ultra-fast public DC fast charging stations open or coming soon in California today, and it will begin work on Cycle 2 investments next month.

Electrify America is committed to driver-friendly, accessible charging stations. All public Electrify America charging stations include multiple payment options, including credit and debit card readers.

And all public Electrify America stations also support the OCPI 2.1 interface to communicate with other networks and Open InterChange Protocol (OICP) to connect to roaming platforms.

Therefore, Electrify America's public stations comply with the requirements of this proposed regulation today, and we support CARB proceeding with a few minor modifications.

Electrify America values the ongoing commitment of CARB staff to conducting stakeholder engagement around the proposed regulation. And Electrify America would like to thank CARB for the proposed modifications brought forward today, which dramatically improve this proposal.

Workplace Charging

In particular, Electrify America appreciates that CARB has committed to clarify the definition of workplace charging. SB 454 explicitly exempted workplace charging from this regulation. Electrify America's vendors – Greenlots, SemaConnect, and EVConnect – are installing approximately 1,000 Level 2 chargers at workplaces across California on Electrify America's behalf.

We respectfully request that CARB board members confirm at this hearing that workplace charging stations installed by our vendors will not be subject to reporting and credit card reader requirements.

Reporting

Electrify America also appreciates that CARB has reduced the reporting requirements. But the regulation would still require reporting that is burdensome on industry. We urge that reporting of transaction type be made voluntary and mandatory reporting be limited to the reporting to NREL referenced in SB 454.

Electrify America has determined that compiling the annual report of transaction types will require Electrify America to integrate multiple data reports from (1) its network provider and (2) its credit card processor. To meet an auditable standard of accuracy, Electrify America will need to make new ZEV infrastructure investments in reporting capacity and capability.

If CARB does plan to proceed with requiring reporting of transaction types, Electrify America urges CARB to clarify its definitions of “payment types”. For example, Electrify America would appreciate knowing whether a credit card transaction made using tap near field communication technology should be considered a (1) credit card purchase or (2) an NFC purchase.

Electrify America appreciates the opportunity to comment and looks forward to continuing to work with CARB, charging providers, and EV drivers to build a robust, easily accessible public charging network for electric vehicles.