



October 26, 2018

Mr. Mark Williams, Mailstop 3E
California Air Resources Board
P.O. Box 2815
Sacramento, California 95812

Re: Electrify America's Proposed Cycle 2 ZEV Investment Plan

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to support and offer feedback on Electrify America's Proposed Cycle 2 California Zero-Emission Vehicle (ZEV) Investment Plan.

CalETC supports and advocates for the transition to a zero-emission transportation future as a means to spur economic growth, fuel diversity and energy independence, ensure clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation including plug-in electric vehicles of all weight classes, transit buses, port electrification, off-road electric vehicles and equipment, and rail. Our board of directors includes: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, and the Southern California Public Power Authority. Our membership also includes major automakers, manufacturers of zero-emission trucks and buses, and other industry leaders supporting transportation electrification.

Although California is leading the nation in ZEV adoption, our state still has a long way to go to reach the goals in the new Governor's Executive Order B-48-18: 5 million ZEVs on California roads by 2030 and specified levels of zero-emission vehicle infrastructure by 2025 to support the transition to these vehicles. In addition, the state must implement SB 1275 (De León) [Chapter 530, Statutes of 2014] and SB 1204 (Lara) [Chapter 524, Statutes of 2014], which set targets for the deployment of 1 million zero- and near-zero-emission vehicles by 2023, access to these vehicles by disadvantaged and low- and moderate-income communities, and deployment of zero- and near-zero-emission medium- and heavy-duty vehicle technologies. Additional access to ZEV fueling, and broader education and outreach is essential to meet the state's ZEV adoption goals.

CalETC supported Electrify America's California Cycle 1 ZEV Investment Plan, as well as the supplement to the Cycle 1 Plan. Electrify America's Cycle 2 Plan will continue to help address barriers to accelerating the ZEV market across California, including within disadvantaged and low-income communities. We believe the Cycle 2 Plan meets the terms and goals of the 2.0L Partial Consent Decree and CalETC supports Electrify America's plans to install ZEV-fueling infrastructure; engage in ZEV public education, awareness, and outreach activities; drive station utilization; and continue access efforts in Sacramento under the Green City Initiative.

Adequate ZEV-fueling infrastructure is essential to reach the state's clean-vehicle goals. As it relates to electric vehicle charging infrastructure, CalETC found that California will need to invest over \$2.2 billion—beyond known public, utility, and settlement funding—by 2025 to ensure adequate public light-duty electric vehicle charging.¹ Electrify America's proposed second investment in ZEV-fueling infrastructure, of about \$153 million, is a step in the right direction to reduce California's gap in ZEV-fueling infrastructure. However, because there is such a large need, Electrify America's investment will continue to leave room for significantly more private- and public-sector investment. We support Electrify America's designated focus areas for investment: metro community DCFC infrastructure, highway and regional route DCFC infrastructure, residential L2 infrastructure and supporting programs, bus and shuttle charging infrastructure, rural community L2 charging infrastructure, two commercial autonomous charging stations, and exploration of renewable generation installation to complement and support charging infrastructure where cost effective.

CalETC supports Electrify America's proposed investment for metro community charging, including DCFC stations in nine key metropolitan areas with high projected concentrations of EVs. There is a clear and growing need for additional DCFC hubs in key urban markets, and these investments can have a substantial near-term impact in supporting transportation electrification. As noted in the plan, these stations can provide a charging solution for potential EV drivers living in multifamily dwellings. Additionally, metro-area DCFC stations can enable greater electrification of high-mileage shared use and commercial applications, such as rideshare and delivery. While there are vitally important public and private investments being made in this space, we believe that Electrify America's investments can and should complement the planned and existing infrastructure, and we recognize a need for balancing metro and rural investment.

CalETC is pleased to see the proposed Cycle 2 Plan incorporate \$2 million for rural level 2 community installations. However, additional investment will be needed so that rural communities are adequately served by electric vehicle infrastructure to enable mass adoption of EVs to all Californians. We recommend that Electrify America consider allocating additional funds to rural community L2 charging infrastructure and consider also siting DCFC infrastructure outside the most populated metro areas, e.g., locations between rural and metro areas, or even directly in cities located in more rural areas. More ubiquitous public charging infrastructure is needed to provide these communities with the confidence to purchase or lease EVs, as well as to support those traveling in and through these areas. For example, communities in the Central Valley, in addition to the Fresno metro area, would greatly benefit from access to charging infrastructure. We recognize that much of the proposed investment in highway and regional route DCFC will occur outside metro areas, and support this investment. Cycle 2 provides a unique opportunity to expand the state's charging network and move toward a future where all Californians have adequate access to charging.

¹ Needed infrastructure to meet with Governor's goal of 5 million ZEVs on the road by 2030 is at least 239,800 L2 charging stations, 10,000 DCFC stations, and 200 hydrogen stations. California Legislative Analyst's Office. The 2018-19 Budget: <http://www.lao.ca.gov/Publications/Report/3747>.

Regarding the residential and rural community L2 charging infrastructure proposed investment, we emphasize the need for charging at multifamily dwellings and workplaces. Currently, the majority of electric vehicles drivers charge at home and at their place of work. CalETC suggests that the residential and rural community funds include a focus on multifamily dwellings and workplaces.

In the proposed Plan, Electrify America seeks to dedicate certain charging sites to shared-mobility drivers. Charging infrastructure for shared-mobility drivers will help increase the number of zero-emission miles traveled and help introduce more Californians to electric vehicles. We support this concept, and encourage CARB and Electrify America to ensure that these dedicated sites benefit all shared-mobility drivers, regardless of vehicle-type or shared-mobility platform.

We also recommend Electrify America retain flexibility to support medium- and heavy-duty applications in addition to transit. For example, school buses present an opportunity for charging-infrastructure investment, which would align with bus funding programs, like the Energy Commission's School Bus Replacement Program (funded by Prop. 39, 2012), which does not currently include infrastructure support.

In addition to charging infrastructure, targeted brand- and technology-neutral public education and access initiatives will help raise consumer awareness and understanding of ZEVs. Currently, consumers have a limited understanding of ZEV technologies and available ZEV options. In a report released by the National Renewable Energy Laboratory, researchers found that over half of survey participants, of a 1,015-household sample, were unable to name a specific PEV make and model.² We support Electrify America's planned brand-neutral education, awareness, and outreach activities to boost adoption of plug-in electric and fuel-cell electric vehicles across the market. These activities allow consumers to discover that ZEVs are fun to drive, will fit into their lifestyle, and have other benefits relative to traditional internal combustion engine vehicles.

Electrify America also plans to invest in a branded media campaign to generate awareness of its ZEV fueling infrastructure footprint and drive station utilization. These activities will use Electrify America branding, but will not feature or favor Volkswagen vehicles. We support this investment to meet the Appendix C requirement that Electrify America target utilization to demonstrate its investments are addressing needs of the ZEV market; and we support Electrify America ensuring that Volkswagen vehicles are not featured or favored in this campaign.

CalETC supports the continuation of the Green City Initiative in Sacramento. It is imperative that Electrify America continue to provide operational support and guidance for the Green City Initiative. This Initiative includes two ZEV car-share programs, two battery-electric bus/shuttle services, and substantial investments in associated charging infrastructure. In addition to reducing emissions, these projects will help raise consumer awareness of ZEVs, as riders will experience the technology firsthand. We recognize

² Singer, Mark. National Renewable Energy Laboratory. 2016. Consumer Views on Plug-In Electric Vehicles – National Benchmark Report http://www.afdc.energy.gov/uploads/publication/consumer_views_pev_benchmark.pdf.

that programs like these will provide access to ZEVs by underserved populations who do not own, or cannot afford to own ZEVs. Electrify America's projects build upon the car-sharing-service groundwork Sacramento has initiated, which serves low-income communities.

Electrify America's investments in infrastructure, education and outreach, and the Green City Initiative will significantly benefit low-income, disadvantaged, and underserved communities. Electrify America proposes to ensure that at least 35% of its cycle 2 investments are in low-income and disadvantaged communities. In some investment categories, low-income and disadvantaged communities will benefit at much higher levels. For example, in the Green City Initiative, more than 70% of the service territories for two car sharing programs are in low-income or disadvantaged communities. Similarly, the Sacramento Regional Transit EV micro-shuttle service will operate in areas that are 90% low-income or disadvantaged.

In relation to all of these components of the proposal, and as included in our prior comments on cycle 1, CalETC supports necessary safeguards to ensure that Electrify America investments facilitate widespread electrification across automakers. Volkswagen vehicles must not be inadvertently favored in infrastructure access through preferential pricing or other means. Additionally, we support a firewall in place between Volkswagen and Electrify America to address data-privacy and competitiveness issues. A firewall should ensure Volkswagen will not have the ability to access automaker or consumer data from Electrify America.

For these reasons, CalETC supports Electrify America's Cycle 2 California ZEV Investment Plan and recommends the California Air Resources Board approve the Plan with the modifications recommended above.

Thank you for your consideration. Please do not hesitate to contact Eileen Wenger Tutt or Hannah Goldsmith at (916) 551-1943, eileen@caletc.com or hannah@caletc.com, should you have any questions.

Sincerely,



Eileen Wenger Tutt, Executive Director
California Electric Transportation Coalition