



June 24, 2022

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: EVCA Comments on the Draft 2022 Scoping Plan Update**

The Electric Vehicle Charging Association (EVCA) appreciates the opportunity to comment on the Draft 2022 Scoping Plan Update (“Plan”). EVCA is a not-for-profit organization comprised of leaders throughout the value chain of the electric vehicle (EV) charging industry to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the expeditious and efficient adoption of EVs and deployment of EV charging infrastructure.

EVCA strongly supports California’s goals to reduce its greenhouse gas emissions (GHG) by 40% below 1990 levels by 2030 and to get to carbon neutrality by 2045 or earlier. As the Plan notes, transportation electrification is key to achieving these goals as it is the largest contributor to the GHG inventory. To this end, we strongly support California’s goal of achieving 100 percent ZEV sales of light-duty vehicles by 2035 and medium- heavy-duty vehicles by 2040. Finally, we support prioritizing disadvantaged low-income communities and communities of color as we transition to a zero-emission economy.

We offer the following comments on the Transportation Sustainability section of the Plan.

**1. Technology**

The Plan outlines a number of steps necessary to achieve success and we elaborate on them below:

Ensure that the transition to ZEV technology is affordable for low-income households and meets the needs of communities and small businesses.

A critical component to achieving affordability is prioritizing funding for utility make ready infrastructure, as this is often one of the costliest pieces of charging infrastructure and thus a barrier to entry for lower income drivers. We urge the Plan to highlight this opportunity and coordinate with the CPUC to prioritize these utility investments.

Prioritize incentive funding for heavy-duty ZEV technology deployment in regions of the state with the highest concentrations of harmful criteria and toxic air contaminant emissions.

It is critical to support heavy-duty (HD) ZEV technology and the charging to support it. It is important to note that charging is needed in those communities with high concentrations of air pollution, but also the locations the HD vehicles are driving to and from to ensure they can charge along their entire route.

Promote private investment in the transition to ZEV technology, undergirded by regulatory certainty, such as infrastructure credits in the Low Carbon Fuel Standard for hydrogen and electricity, and hydrogen station grants from the California Energy Commission's Clean Transportation Program pursuant to Executive Order B-48-18.

Regulatory certainty and investments in ZEV technology are critical and we are strongly supportive of the LCFS program. However, we note that EVs make up the majority of ZEVs in the state and therefore more incentives should be directed to EVs over hydrogen to accommodate for the higher need.

Evaluate and continue to offer incentives similar to those through FARMER, Carl Moyer, the Clean Fuel Reward Program, CAPP, and Low Carbon Transportation, including CORE.

These incentives are critical to supporting a transition to a zero-emission economy and we are supportive of their continuation.

Continue and accelerate funding support for zero emission vehicles and refueling infrastructure through 2030 to ensure the rapid transformation of the transportation sector.

As mentioned above, we are supportive of continued funding for ZEVs and EV infrastructure.

Evaluate and align with the Draft 2022 Scoping Plan relevant policies such as Advanced Clean Cars II, Advanced Clean Fleets, Low Carbon Fuel Standard, etc.

Beyond ARB programs, we encourage all state agencies involved in ZEV and EV technology to coordinate their plans and programs to better support the state's ZEV goals.

Identify and address permitting and market barriers to successful rapid ZEV technology deployment while protecting public health and the environment.

This is a critical step the state must take. EVCA has worked with the state for years to address permitting and market barriers and welcomes the opportunity to continue these efforts with ARB along with other agencies including the Energy Commission and the Building Standards Commission.

## 2. Fuels

Most importantly, CARB should accelerate and extend the carbon intensity (CI) targets under the LCFS to be consistent with the State's goal of carbon neutrality by 2045. CARB should make clear that it intends to:

- ***Make the pre-2030 targets more aggressive as soon as possible.*** Increasing the CI reduction targets as soon as possible will support the credit market and send a positive signal to clean fuels and infrastructure investors. Currently, due to the steady decline in credit prices, new investment in charging is at risk jeopardizing new charging station deployments. This is happening against the macro backdrop of rising interest rates causing investors to discount projects and deploy less capital. Increasing the CI targets under the LCFS as soon as possible (and messaging the intent to do so) will help support the credit market and attract new investment in transportation electrification.
- ***Set ambitious post-2030 CI reduction targets and communicate CARB's intent to align long-term targets to State climate goals.*** CARB should strengthen and extend the LCFS beyond 2030 and make clear that it intends to align the LCFS program to the Scoping Plan to meet carbon neutrality by 2045. Long term certainty, as much as short term credit prices, is critical to attract steady investment and achieve the state's long-term carbon neutrality goals. In setting long-term goals, CARB should consider what fuels will play a role in California's carbon neutral future and set standards to ensure the production and use of those fuels is incentivized while fuels that do not contribute to long-term carbon neutrality are not incentivized long-term under the program.

Strengthening the CI targets will support and continue to attract new investments in low carbon transportation technologies, including EVs and EV infrastructure. Lowered LCFS prices put these investments at risk and may lead to infrastructure buildout diverted to other regions with more attractive financial incentives.

In addition, EVCA suggests the following changes to the LCFS program which will help speed up transportation electrification in the State.

1. **Re-classify multifamily charging as non-residential under the program.** Multifamily housing has traditionally been more difficult than other sectors (commercial, single family, etc.) in terms of installing charging. The sector is typically more cost constrained

and more acutely faces the principal-agent problem, where property developers incur direct costs but have been more reluctant to see the benefits of installing charging. Installing sufficient charging at multifamily locations however will be critical to transitioning this driver base to electric and meeting the State's long-term climate and ZEV goals. Re-classifying multifamily charging under the LCFS is a simple and effective way to create a significant new incentive for multifamily and apartment property developers and owners to install charging for residents. Financing models that have emerged around non-residential charging under the LCFS can then be deployed in the multifamily sector which will accelerate deployments. We understand that credits from multifamily charging do contribute to the Clean Fuels Reward EV rebate under the program, however we feel that opening up crediting to multifamily charging operators will do more to electrify this driver base by helping to finance infrastructure deployments at these locations so more drivers have the confidence to transition to an EV.

2. **Extend the ZEV infrastructure crediting window and include heavy-duty charging and hydrogen refueling.** The LCFS' infrastructure crediting provisions have been extremely effective at financing public fast charging aimed at light-duty vehicles in the State. Extending this provision to allow infrastructure crediting for heavy duty charging (public and private), and allowing battery storage costs to be eligible, will be an equally significant market signal for fleets to invest in heavy duty EVs and charging and transition the heavy-duty vehicle segment towards ZEV faster. EVCA strongly supports CARB's proposal to do so in the proposed scenario.
3. **Implement a credit price floor going forward.** Similar to how CARB implemented a price ceiling in the 2018 LCFS rulemaking, we recommend CARB consider adopting a price floor in the market as well. This would balance out the risk of higher than expected credit prices and the need for a cap with the risk of perpetually low credit prices and commensurately low investment in transportation decarbonization.

Beyond addressing the CI targets and the specific points above, EVCA is generally supportive of the following strategies:

- Accelerate the reduction and replacement of fossil fuel production and consumption in California.
- Continue incentives for private investment in new zero-carbon fuel production in California, including extension of FCI beyond its currently slated program end in 2025.
- Invest in the infrastructure to support reliable refueling for electric transportation.
- Develop a rapid and robust network of ZEV refueling infrastructure to support the needed transition to ZEVs.
- Promote private investment in the transition to ZEV technology, undergirded by regulatory certainty, such as infrastructure credits in the Low Carbon Fuel Standard for hydrogen and electricity.

- Continue and accelerate funding support for zero emission vehicles and refueling infrastructure through 2030 to ensure the rapid transformation of the transportation sector
- Ensure that the transition to ZEV technology is affordable for low-income households and meets the needs of communities and small businesses.

### **3. Vehicle Miles Traveled**

In regard to “implementing equitable roadway pricing”, we encourage ARB to consider the multiple benefits ZEVs afford society when determining how much ZEVs vs ICE cars should pay per VMT, as well as in differentiating the behavioral and operational economic considerations of personally-owned ZEVs against ZEV fleets.

We are generally supportive of “the deployment of autonomous vehicles, ride-hailing services, and other new mobility options toward high passenger-occupancy and low VMT-impact service models that complement transit and ensure equitable access for priority populations”. Shared electric fleet services present tremendous value to achieving California’s long-term emissions reductions and electrification targets - particularly in their ability to provide the public with access to clean miles, regardless of the ability to own an EV or conveniently charge. EVCA encourages CARB to consider the role that these new mobility technologies and services can provide in terms of both the Scoping Plan as well as broader initiatives to achieve the state’s emissions and ZEV adoption goals.

Thank you for this opportunity to provide these comments on the Draft 2022 Scoping Plan Update. We look forward to working with ARB, their sister agencies, and other stakeholders to implement California’s ambitious climate goals.

Sincerely,

Reed Addis  
Governmental Affairs  
Electric Vehicle Charging Association