

5/28/2021

California Air Resources Board
1001 I St.
Sacramento, CA 95814

RE: Support for Electrify America's Cycle 3 Investment Plan

Dear California Air Resources Board Members:

Energy Tariff Experts, LLC (ETE) is an energy consulting firm active throughout North America. Many of our clients and subcontractors are California businesses. The purpose of this letter is to support of Electrify America's Cycle 3 California ZEV Investment Plan. ETE's services include energy cost studies and regulatory consulting. A growing segment of our business is related to consulting regarding EV adoption among general consumers and fleet operators. ETE's services for EVs include expert witness support in regulatory proceedings, cost studies regarding cost to operate EV chargers, EV charger design including integration of renewables and storage, and EV charging logic to minimize peak demand charges or grid operator capacity charges.

Electrify America's proposed \$200 million investment in California over 30 months will bring the state closer to achieving its emissions goals to combat climate change and improve air quality by transitioning to zero emission transportation, including in transit and heavy-duty applications.

Their plan has several critical elements that we would like to highlight:

- \$25M to increase access to EV charging infrastructure in the Wilmington/Long Beach area
 - This is an air quality "extreme non-attainment area" and the drayage trucks serving the Port are ideal candidates for electrification due to their short duration trips and limited geographic range
- A focus on electrification of municipal transit buses
- Provisions to expand access to ride share and taxi operators where vehicles are used intensively and savings on fuel and maintenance expenses relative to internal combustion engine vehicles may increase driver earnings potential as well as reduce vehicle emissions
- \$81M investment in rural areas including the Central Valley
- Expansion into new regions including Bakersfield, Oxnard, Thousand Oaks, Ventura, Santa Maria-Santa Barbara, Stockton, and Visalia

Electrify America's plan will accelerate California's ZEV goals by creating an ecosystem that reduces customer barriers to EV adoption. Access to local and available charging infrastructure is required for average consumers to switch to EVs. Electrify America's will accomplish this objective while simultaneously attacking transit and medium/heavy duty vehicles in the Long Beach port area which are great candidates for electrification.

As ETE's principle and an EV owner, I can attest to the importance of these fundamental investments in the EV ecosystem. I live in a condo and park on the street. I rely on public EV charging networks such as Electrify America's to charge my vehicle and investments by Electrify America to build two charging stations within two miles of my house were important in my decision to purchase the Chevy Bolt.

Electrify America's investments are creating economic opportunity for many stakeholders including ETE and our subcontractors. For example, responding vendors to Electrify America's 2020 survey identified more than 8,000 workers employed by themselves and subcontractors that worked on Electrify America projects from July to December 2020, including 1,022 workers in California. Of these workers, vendors reported that 62% lived in low-income and disadvantaged communities.¹

We respectfully urge you to find that Electrify America's Cycle 3 California ZEV Investment Plan is consistent with requirements at your June 24th meeting, in order not just to keep California on the forefront of, but a leader in, the fight against climate change.

Respectfully,

James D. Bride
President – Energy Tariff Experts, LLC
50 Milk Street, 16th Floor
Boston, MA 02109

¹ "2020 Annual Report to CARB." April 30, 2021.
<https://media.electrifyamerica.com/assets/documents/original/681-2020ElectrifyAmericaCaliforniaAnnualReportPublic.pdf>