

June 14, 2017

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Volkswagen (VW) ZEV Investment Plan: Appendix C

Dear Chair Nichols and Board Members,

BMW of North America (BMW NA) is pleased to submit comments on the Supplement to the California ZEV Investment Plan, Cycle 1. The supplementary document released in June 2017 provides useful additional information on how ZIP will address existing barriers to ZEV uptake.

BMW NA strongly believes that the ramp-up of e-mobility relies on satisfactory charging infrastructure coverage and its accessibility to all electric vehicle drivers. The Volkswagen ZEV Investment Plan (ZIP) requires neutral consumer education, coupled with the expansion of accessible charging infrastructure throughout California in a variety of public places, multifamily dwellings, communities and workplaces, including under-served communities. The continued strategic expansion of accessible charging infrastructure is crucial to secure future adoption of ZEVs. A critical component to growing the electric vehicle market will be a focus on multi-unit dwellings where charging installation can be challenging. The supplement report, however, does not provide guidance on how the siting for the charging stations will be realized and controlled to ensure that ZIP infrastructure will help drive ZEV adoption with the greatest societal benefit possible.

BMW NA encourages and supports investments in electric vehicle infrastructure programs that further promote equitable OEM and consumer public charging infrastructure accessibility, driver education and EV awareness. One of the biggest barriers to rapid adoption of ZEVs is still the lack of sufficient consumer awareness of electric vehicles. The supplementary document, however, does not specify which channels will be used for the dissemination of the awareness raising campaign for electric vehicles and infrastructure.

We understand that the charging infrastructure will be compatible with electric vehicles from all major brands and will enable multiple non-proprietary connectors and charging protocols. The supplementary report does not provide details on the operations of the nation's largest network of charging infrastructure. It will be imperative for other electric vehicle manufacturers to protect their customers' data, customer experience and customer support in a manner that ensures the Plan does not allow an undue competitive advantage for VW. A single OEM controlling areas of deployment and customer experience, should not benefit more than other market players through its ability to control day-to-day operations of consumer charging events (queuing,

Company
BMW Group

BMW Group Representative
Office California

Address
980 9th Street
Suite 950
Sacramento, CA - 95670

Telephone
(916) 476-5688

E-mail
Angela.Konert@bmwna.com

Website
www.bmwgroup.com

reservation, pricing, billing and payment or integration into mobility platforms). The report states that stations would be designed to be interoperable with other charging networks. Little detail is provided on how charging interoperability would be advanced through this Plan.

The availability of public charging infrastructure will have a decisive share in reducing potential users' range anxiety and champions the decision to buy an electric vehicle. Thus, BMW NA has been directly investing millions of dollars per year in publicly accessible fast charging infrastructure and has directly supported the installation and availability of hundreds of fast chargers nationwide, through multiple projects. Since more infrastructure is still required BMW NA believes that the charging infrastructure provided under the Plan will further support the sales of ZEVs. BMW shares California's vision for a future of sustainable mobility and will continue to be an active supporter and partner of the vision and goals.

Thank you very much for considering BMW NA's comments and please feel free to contact me if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink that reads 'Angela Konert'.

Angela Konert
Vice President Government and External Affairs
BMW Group Representative Office California