



September 19, 2019

RE: Public Availability of Modified Text and Availability of Additional Documents and Information for the Electric Vehicle Supply Equipment Standards Regulation

On behalf of the steering committee members of the Charge Ahead California Campaign (Coalition for Clean Air, Communities for a Better Environment, Environment California, The Greenlining Institute, and the Natural Resources Defense Council), we write to express our support for the Air Resources Board's (ARB) modified "Electric Vehicle Supply Equipment Standards," which would ensure more reliable and equitable payment access for all electric vehicle drivers.

To meet the goals of the Charge Ahead California Initiative (SB 1275, De León) of creating a mainstream market for electric vehicles and increasing access to those vehicles for low- and moderate-income households and for residents in disadvantaged communities, customers need reliable access to electricity as a transportation fuel where they live, work, and play. Senate Bill 454 (Corbett, 2013) was enacted by the Legislature to accomplish exactly this, and ARB's proposed regulations appropriately align with the vision of SB 454 by setting standards that provide drivers convenient and simple payment methods for charging.

The regulations would promote reliable access by requiring public charging stations to accept credit card payment in the forms that would most align with customer expectation, in addition to mobile payment technology. Customers should be able to pay for charging at these stations just as they would expect to be able to at gas stations or parking meters, and that entails a physical chip card reader—not contactless cards or proprietary RFID tags, which ARB has recognized many customers currently lack. The proposed regulations set out standards that are aligned with both the present and the future of customer charging needs, ensuring equitable access to charging as electric vehicle adoption expands to a broader and more diverse base of drivers. We also understand ARB's


intent is to conduct a technology review over the next few years, and we believe this is an appropriate solution to address concerns that the credit card market may shift in the near future.

We appreciate the opportunity to comment on the modified regulations, which will advance California's climate, air quality, and equity goals.


Respectfully submitted,


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