May 17, 2021

Ms. Liane Randolph
Chair, Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: FLO Comments on the California Clean Miles Standard Proposed Regulation Order

Dear Chair Randolph,

Thank you for the opportunity to comment on the draft regulation order (order) for the Clean Miles Standard.

FLO is a leading North American charging network for electric vehicles (EV) and a major provider of smart charging software and equipment. FLO offers public, commercial, and residential chargers, including Level 2 EV supply equipment and DC fast chargers. In North America, FLO has deployed over 40,000 charging stations and manages approximately 500,000 unique charging experiences that transfer 5.5 GWH of energy monthly. FLO's headquarters and network operations are based in Québec City.

FLO strongly supports the proposed order, as it will help electrify a large vehicle segment, further advancing California toward achieving its GHG reduction and zero-emission vehicle deployment goals. Electrifying such a large segment of vehicles will further support economies of scale for this entire industry, including increasing demand for and supporting the build out of charging infrastructure.

As the board consider the proposed order for adoption, FLO respectfully recommends it consider adapting the regulation to incentivize transportation network companies (TNCs) to invest in charging stations.

FLO supports the Board's decision to allow TNCs to earn credits toward compliance if they invest in bike lanes and integration with public transit. We respectfully encourage the Board to consider broadening this flexibility and further reward innovation from TNCs – for instance, TNCs should also be able to earn credits toward their eVMT targets if they invest in ZEV charging stations. As the Board knows, the state will currently fall short of its 2025 charging station deployment goal by approximately 60,000 charging stations, and the infrastructure requirements to meet California's 2035 ZEV sales requirement are exponentially higher than the current number of stations deployed.

Rewarding TNCs for privately financing public charging stations would bolster infrastructure deployment and could further complement existing public and ratepayer incentive programs from the Board, Energy Commission, and Public Utilities Commission. This would also have the benefit of helping further the success of this regulation as it would support TNC drivers transition to ZEVs by bolstering their confidence in available charging stations. As noted in analysis by the Energy Commission, there is a lack of needed infrastructure for ride-hailing, especially in downtown cores, airports, and multi-unit dwellings, which will be critical to supporting the implementation of the order. Therefore, we respectfully request the Board adopt modifications to the order to offer a credit against the percent of eVMT targets applicable to TNCs for investments made by them in ZEV infrastructure. This could be constructed broadly to allow flexibility to the TNC to fund station deployment, own the stations themselves, or perhaps another model.

Despite important progress in recent years, the ZEV and charging industries are still nascent and rapidly evolving. As part of any incentives to help TNCs electrify their vehicle supply, we respectfully encourage the board to remain agnostic to business models and technologies, in order to allow companies the flexibility to innovate to reach the targets outlined by the regulation.

Thank you for your consideration,

[Electronically submitted]

Cory Bullis
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FLO