



Plug In America  
6380 Wilshire Blvd  
Suite 1000  
Los Angeles, CA 90048  
(323) 372-1236

September 19, 2019

Chair Mary Nichols and Members of the Board  
Dr. Richard Corey, Executive Officer  
California Air Resources Board  
1001 I Street,  
Sacramento, CA 95814

**Re: Electric Vehicle Supply Equipment Standards – 15-day Notice of Modified Text**

Dear Chair Nichols, Members of the Board, Dr. Corey, and ARB Staff

Plug In America works to accelerate the shift to plug-in vehicles powered by clean, affordable, domestic electricity to reduce our nation's dependence on petroleum and improve the global environment. As the organization representing the more than six hundred thousand California EV drivers and millions of potential future consumers of plug-in hybrids and fully electric vehicles, we strongly support the proposed EVSE regulation, along with the 15-day modifications, implementing SB 454, the EV Open Access Act.

As one of the original supporters of Senator Corbett's SB 454 (2013), Plug In America's goal was to make charging an EV as simple for a consumer as filling your tank with gasoline. We wish to thank ARB staff and the Board for moving the concept of real open access for EV charging so much closer to fruition.

During the June 27, 2019 hearing, Board Members Fletcher, Sherriffs, and Takvorian, along with Chair Nichols, all highlighted the need for more open access in disadvantaged communities. This area was not specifically covered in the 15-day Notice, and we hope that it might still be addressed in the regulatory process or during the implementation phase. Disadvantaged communities are disproportionately impacted by the lack of credit/debit/prepaid card readers on EV chargers. According to the FDIC, 25% of all of California households are either unbanked or underbanked. In minority and disadvantaged communities this number rises to 50%.<sup>1</sup>

We are just reaching the point where used EVs are becoming affordable for this population and the state is making considerable investments to help make this happen. Prepaid cards widely available at grocery and convenience stores can help mitigate this issue with 26.9% of unbanked households using them for a variety of purchases.<sup>2</sup> This is why Plug In America

<sup>1</sup> Federal Deposit Insurance Corporation, The 2017 National Survey of Unbanked and Underbanked Households, [https://economicinclusion.gov/surveys/2017household/documents/tabular-results/2017\\_banking\\_status\\_California.pdf](https://economicinclusion.gov/surveys/2017household/documents/tabular-results/2017_banking_status_California.pdf)

<sup>2</sup> Federal Deposit Insurance Corporation, The 2017 National Survey of Unbanked and Underbanked Households, <https://economicinclusion.gov/surveys/2017household/prepaid-cards-findings/>

believes that card readers on EV chargers are a ubiquitous solution for all EV drivers and why we support the regulation. In order to send the strongest possible signal to the market, we believe that ARB should encourage incentives to reward early adoption of card readers prior to the implementation dates, especially in disadvantaged communities, via both internal ARB programs and working with other State agencies, like CEC and CPUC.

We appreciate your consideration of our recommendations as you further refine the proposed regulation.

Sincerely,



Jay Friedland  
Senior Policy Advisor  
Plug In America

cc: Steve Cliff, California Air Resources Board  
Analisa Bevans, California Air Resources Board  
Joshua Cunningham, California Air Resources Board  
Elise Keddie, California Air Resources Board  
Stephanie Palmer, California Air Resources Board  
Kathryn Lynch, Legislative Advocate, Plug In America

Plug In America is the leading national consumer voice promoting the use of plug-in electric vehicles in the United States to consumers, policymakers, auto manufacturers and others. Formed as a non-profit in 2008, Plug In America provides practical, objective information collected from our coalition of plug-in vehicle drivers, through public outreach and education, policy work and a range of technical advisory services. Our expertise represents the world's deepest pool of experience of driving and living with plug-in vehicles. [www.pluginamerica.org](http://www.pluginamerica.org)