



May 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:

Uber is pleased to write in support of Electrify America's Cycle 3 California ZEV Investment Plan. This significant, \$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.

Last year, Uber made a global commitment to fully electrify our rideshare platform by 2040 along with \$800 million in resources to help drivers make a fair transition. Recent reports by researchers from UC Davis and Uber show that when higher-utilization drivers—not only ridesharing drivers on Uber, but also taxi drivers and other commercial transportation service providers—make a fair transition to electric vehicles, communities can realize 3 to 4 times greater emissions savings compared to when average car owners switch. Rideshare platforms like Uber are well positioned to leverage limited resources and optimize the utilization of electric vehicles and infrastructure, playing a key part in helping California meet its ambitious goals.

This is the third of four investment cycles by Electrify America, which is investing (a separate) \$800 million over 10 years to accelerate transportation electrification in California. The Cycle 3 ZEV Investment Plan will continue to expand access to zero emission vehicles (ZEV) in California, by further building out ultra-fast charging infrastructure in metropolitan areas and along highway corridors, supporting transit and medium- and heavy-duty fleet charging, and continuing to invest in brand neutral education and awareness efforts, including supporting and sponsoring the ZEV education and training of other organizations.

Importantly, the plan continues to prioritize rural, disadvantaged, and low income communities for investment, to ensure that all communities can access charging and benefit from the transition to electric vehicles. Among other activities identified in the plan, Electrify America will invest \$25 million investment in a Green City program in the Long Beach-Wilmington community, home to the nation's busiest port complex and served by a fleet of more than 18,000

drayage trucks. This targeted investment to support electrification of transit and medium and heavy-duty vehicles in this predominantly disadvantaged and low-income community will advance CARB's priorities to quickly transition buses and drayage trucks to ZEVs, and quickly reduce pollution in a community that is classified as extreme non-attainment under the Clean Air Act.

As it relates to the rideshare industry, which will be working to comply with the most aggressive electrification and GHG-reduction targets in the world under CARB's Clean Miles Standard policy, the Cycle 3 package would enable EA to provide funding for vehicle supply via "purchase and deployment of electric taxis and TNC vehicles in fleets" which Uber has found to be a key barrier for most low and middle income (LMI) drivers. In particular, Uber's pilot program and data suggests that short term rental and lease offerings for electric vehicles presents the best value to prospective drivers given their individual economics, and therefore, the best potential for growth of electric vehicle/passenger miles on our platform. In addition to existing partnerships with rental car companies in California, expanding the availability and affordability of EV access beyond traditional ownership is a prudent investment towards the State's collective goals.

Electrify America's investments are creating economic opportunity for many stakeholders. 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,

Adam Gromis
Global Head of Sustainability
Uber

Austin Heyworth
Senior Public Affairs Manager
Uber

¹ "2020 Annual Report to CARB." April 30, 2021.

<https://media.electrifyamerica.com/assets/documents/original/681-2020ElectrifyAmericaCaliforniaAnnualReportPublic.pdf>