

May 28, 2021

California Air Resources Board

1001 I St.

Sacramento, CA 95814

cleancars@arb.ca.gov

RE: Support for Electrify America's Cycle 3 Investment Plan

Dear California Air Resources Board Members:

I am writing on behalf of the Marin/Sonoma EV Squad, part of the Climate Reality Project Bay Area Chapter in support of Electrify America's Cycle 3 California ZEV Investment Plan (Cycle 3 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.

Overall, we believe Electrify America is doing a great job of expanding EV charging infrastructure in California and nation-wide. We have worked directly with Electrify America to identify and develop several charging station locations in Marin County and have found Electrify America to be a responsive, capable, and effective partner.

We appreciate the way Electrify America has developed and applied a corporate social responsibility framework for enabling electric transportation, committing to environmental sustainability, creating a positive community impact, and ensuring equality and diversity to ensure its investments are leading toward a cleaner, more equitable, and just world. And we also appreciate the way Electrify America has reached-out to the public to get feedback and apply lessons learned.

We strongly support Electrify America's proposed Cycle 3 Plan and its three investment categories: Infrastructure; Education, Awareness, Access, and Marketing; and Green Cities. However, we have two recommendations for modification of the Cycle 3 Plan:

- (1) Increase the focus on providing charging infrastructure in areas with a high density of multi-unit dwellings (MUD) regardless of whether they are in low-income or disadvantaged communities. The inability of MUD residents to "charge at home" is a major barrier to EV adoption by MUD residents regardless of their financial status.
- (2) Substantially increase the focus and funding on improving the customer experience. First-hand and survey data show that customers are often frustrated with the experience of using Electrify America charging stations. Unsatisfactory customer experience has the potential to become a major disincentive for drivers to switch to EVs. This is a solvable problem that needs immediate and significant focus and resources. The proposed Cycle 3 budget of only \$2 - \$4M for "Hardware Development and Capacity Building," which apparently includes the subject of customer experience, seems wholly inadequate to achieve Electrify America's Cycle 3 stated goal of ensuring "a fast, reliable, and customer-centric experience at all of our stations."

To assist Electrify America in improving its customer experience, CARB should consider setting reliability requirements for Electrify America charging facilities including requirements for uptime (establishing a minimum percent of hours in a year that each charger must be functional – turned on and capable of delivering a charge), and maintenance and repair (stipulating that repairs be initiated within 24 hours of notification that a charger is nonfunctional). For reference, we understand the Northeast States for Coordinated Air Use Management (NESCAUM) recommends that charging stations supported with public funds be required to maintain a 99% uptime (for DCFC), that there be multiple chargers at each site to provide redundancy (whether DCFC or level 2), and that any necessary repair efforts be initiated within 24 hours of a notice of malfunction.

Thank you for the opportunity to comment on Electrify America's Cycle 3 Plan. We look forward to continuing to work with Electrify America and CARB to rapidly advance the adoption of electric vehicles in California and nation-wide.

Sincerely,

David Moller

David Moller
Marin/Sonoma EV Squad
Climate Reality Project Bay Area Chapter