



November 3, 2018

The honorable

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Sandra Berg

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California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: Comments on Electrify America's proposed Cycle 2 ZEV Investment Plan  
A contrarian position to that taken by the Electric Vehicle Charging Association (EVCA)**

Thank you for the opportunity to provide comments on Electrify America's proposed Cycle 2 ZEV Investment Plan. We recognize that this letter is getting to you after the public comments period, but hope that you will consider EV Connect's position in this matter, which materially differs from that taken by the trade association (Electric Vehicle Charging Association) we are a member of.

EV Connect, established in 2009, is a California-based company which has created an innovative, robust, flexible and feature-rich cloud-based software platform for managing electric vehicle (EV) charging across multiple networks, and their interaction with utilities, energy management systems and drivers. The Company's platform currently manages over 3,000 EV charging ports within North America. In addition, EV Connect is a leading provider of EV charging solutions for commercial, enterprise, hospitality, utility, university and government facilities, and is an active participant in Electrify America's Cycle 1 ZEV Investment Plan, as well as other Volkswagen-funded programs throughout the U.S.

EV Connect wholeheartedly supports the intent and implementation of California's objectives and policies regarding EV investments, particularly as they encourage significant **public adoption** of electric vehicle transportation; **a vibrant, standards-based and open EV charging infrastructure**; and support of a **competitive marketplace** to provide each of the elements of this transportation evolution.

EV Connect is a member of the Electric Vehicle Charging Association (EVCA), but in this matter, does not support many of the positions described in the organization's public comment to CARB in their October 26, 2018 letter. It is unfortunate that we and other members of the Association did not provide input into the letter, as we believe it would have not only reflected a different position, but most certainly would have changed the tone of the letter.

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Scott Jarus, Executive Chairman  
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As such, this letter is intended to present EV Connect's position on the major elements of Electrify America's Cycle 2 ZEV Investment Plan. Where there is concurrence with the position taken by the EVCA, it will be noted. As a starting point, EV Connect is generally supportive of Electrify America's Plan and believes that it will foster continued adoption of electric vehicles as a transportation modality and serve to further expand the infrastructure necessary to support such EV adoption within the State, particularly in communities which are underserved. In addition, an underlying theme of the Electrify America investment is the belief that an *open and standards-based* infrastructure is significantly more efficient and consumer-friendly.

### **Metro/Community Charging (Proposed \$95-115MM)**

Electrify America's Cycle 1 Investments have been successful in rapidly creating additional infrastructure within California and have supported companies, such as EV Connect, Greenlots and SemaConnect, in the expansion of their charging networks. It has aided in making the EV charging marketplace more competitive, particularly for smaller companies which compete with much larger organizations with greater financial resources. Contrary to the position held by the EVCA in their October 26<sup>th</sup> letter to CARB, EV Connect has seen a *decrease* in costs from charging equipment (EVSE) providers caused by efficiencies in production and volume. There has been disruption in the marketplace, but it has been a positive disruption resulting from increased competition and the enabling of smaller providers in the market.

EV Connect supports the position of encouraging CARB to work closely with other California agencies, such as the Energy Commission, to ensure that various incentive programs do not conflict with one another and are supportive, on a unified basis, of California's statewide EV goals. However, we do not feel that, generally speaking, the Electrify America investment plans are materially causing conflicts with other statewide programs.

### **Highway and Region Routes (Proposed \$25-30MM)**

The process of securing site host locations for charging stations, particularly involving DC Fast Chargers (aka Level 3 or 4 chargers), is long, laborious and cumbersome. In addition to finding and contractually securing site hosts to provide EV charging services on their property – something they most likely have no experience doing – it also requires permitting and coordination with the local electric utilities. EV Connect has direct experience with this process through its participation in the Energy Commission's Electrified Highway programs, and can attest to the fact that this process takes a considerable amount of time. As such, we disagree with the EVCA's position that "CARB limits Electrify America to only leasing property up to three months prior to installing stations..."

EV Connect does agree that Electrify America should provide more transparency about which sites they have contracted with so that other providers don't waste time and resources considering the same locations. It would also help providers understand where a significant amount of charging infrastructure is or will already be in place, thereby possibly encouraging these providers to find locations which are underserved.

### **Residential (Proposed \$8-12MM)**

EV Connect believes there is great value in residential charging, *visa vie* multi-unit residential locations. In particular, we have been successful in deploying *multi-family* residential charging, including through

the Electrify American Cycle 1 Investment Plan, and would therefore encourage CARB to consider directing Electrify America toward investing resources in *multi-family* residential locations. Multi-family infrastructure is a very efficient and effective way of encouraging EV adoption to a much larger population of California residents who are generally unable to take advantage of electric vehicle ownership due to a lack of charging capabilities where they live. EV Connect has found through its successful deployment of charging stations within multi-family residential locations, that the adoption and usage is significant.

#### **Station Utilization (Proposed \$10MM)**

EV Connect does not fully understand Electrify America's proposed use of settlement funds to pay for "memberships", but we assume that this may be Electrify America's memberships in various trade associations, collaborative events, etc.

However, if the term "memberships" used by Electrify America includes memberships in an industry-wide program to support interoperability and a relatively seamless experience by EV drivers, EV Connect supports such participation in this effort. EV Connect is a strong believer that the EV charging industry must mature, sooner rather than later, to a point where EV drivers do not need to carry around numerous keys, fobs, cards, etc. to activate charging stations. They must have the ability to utilize *any* public charging station provided by *any* provider, with the "network" determining whom they have a "membership" with (their "home provider") and how the cost of their charging activity will be passed on to this provider and ultimately on to them. EV Connect is already providing this "network" service to some infrastructure providers and believes that this interoperability is one of the cornerstones necessary to accelerate consumer adoption of EVs. By way of example, a cash ATM card issued by an individual's bank establishes a "home" relationship between that consumer and that bank, however, the use of the ATM card is now virtually universal around the world. This is only possible because (a) there is a standards-based and open protocol used by all participating banks, and (b) there is interoperability and interconnectivity to these ATMs through all of the participating banks which enables open access, financial transactions between providers, a method for banks to monetize ATM access, and a seamless consumer experience.

#### **Education (Proposed \$17MM)**

EV Connect believes that consumer education is a critical component necessary to mature the EV marketplace. As such, we support the EVCA position that consumer education funded by Electrify America should be brand-neutral.

As previously stated, EV Connect is generally supportive of Electrify America's Cycle 2 Investment Plan. There are some areas in need of focus and attention, particularly with regard to (a) ensuring the efficient and non-duplicative deployment of EV charging assets; (b) consideration regarding single-family residential deployments vs. multi-family residential infrastructure; and (c) spending money on brand-neutral education of the consumer.

Of importance to EV Connect is a recognition that deployment of Electrify America funds much be based upon a standards-based and open architecture which promotes inter-operability among all EV charging providers.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott Jarus', with a large, stylized flourish extending from the end of the signature.

Scott Jarus  
Executive Chairman