



July 14, 2017

Mary Nichols, Chair  
California Air Resources Board  
1001 I Street  
PO Box 2815  
Sacramento, CA 95812

Greenlots' Comments in Support of CARB Approval of Electrify America's California ZEV Investment Plan

Greenlots appreciates the opportunity to comment on CARB's review of Electrify America's California ZEV Investment Plan. The comments below are intended to be additive to Greenlots' comments dated March 20, 2017, and April 10, 2017 supporting approval of the Investment Plan.

Greenlots is a leading provider of grid-focused electric vehicle charging software and services. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America. Greenlots' smart charging solutions are built around an open standards-based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic EV charging loads. By communicating with hardware through an open communication language, the Greenlots' software platform is able to be paired with a wide range of hardware options, with a focus on protecting the hardware investments made by our partners and clients, and maximizing site host choice. Greenlots is headquartered in Los Angeles, with other California offices in San Francisco and Monrovia.

The Volkswagen (VW) settlement decree represents a unique opportunity to accelerate the electric vehicle and electric vehicle charging markets in California. Expanding these markets will create jobs and new economic opportunity, help California achieve its climate mitigation goals, and protect the health of disadvantaged communities who face the worst effects of tailpipe pollution. We urge CARB to approve Electrify America's California ZEV Investment Plan in an expeditious manner.

Many of the cities Electrify America (EA) is targeting for its investments have a strong record of supporting transportation electrification and are poised to integrate the investment from EA and build and scale upon and around it. Indeed, the prospective Green City of Sacramento is poised to leverage prospective funding with ongoing and new initiatives and investments to truly transform itself into a bastion of clean transportation. Los Angeles is also poised and ready, and Fresno, San Francisco, and San Diego are all gearing up for investment multipliers, as Pacific Gas & Electric and San Diego Gas & Electric ready their infrastructure investment programs.

Deploying DC fast chargers in metros and high power DC fast chargers along highway corridors is a critical step in supporting EV adoption beyond the earliest wave of adopters, as more and more drivers expect or require the equivalent of a gas station fueling experience. This step will help scale adoption and increase market opportunities for all entrants, and build upon limited private

and public investment in DC fast charging.

Electrify America's proposed investment comes at a critical time for the infrastructure market, when despite steady but slow growth, established market participants continue to exit the market and market opportunities—especially for non utilities to own and operate DC fast charging, have continued to be unsustainable. EA's investment would provide opportunities for market participants across hardware, software, installation, and maintenance.

CARB got a good deal for California, and we want to see that deal go forward without further involvement of the courts or a return to Electrify America's drawing board. CARB has continued to press EA for a deeper commitment to supporting disadvantaged communities and EV Equity. Greenlots applauds CARB and EA for creating support for EV Equity well beyond anything contemplated in the consent decree.

California has long been a leader in transportation emissions reduction and environmental policy. More recently California has been a strong national, and indeed, international leader in zero emission vehicle policy and deployment, and climate and clean energy policy. Despite strong support for this technology and growing adoption, California has struggled with an infrastructure deficit that has slowed adoption and the pace of market scaling. EA's proposed investment won't fill the infrastructure gap—indeed it would only represent a small percentage of infrastructure needed to put California on pace to reach its 2025 and 2030 ZEV adoption goals—but not taking advantage of this investment would be an injustice to Californians and the state's efforts to protect the health and environmental welfare of its current and future residents.

Thank you for your consideration. Please do not hesitate to contact me should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Ashley', with a stylized, cursive script.

Thomas Ashley  
VP, Policy  
Greenlots