

# GENERAL MOTORS

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Mr. Mark Williams, Mailstop 3E  
Air Resources Board  
P.O. Box 2815  
Sacramento, California 95812

**Subject: Volkswagen Settlement - Supplement to the California ZEV Investment Plan**

Mr. Williams:

General Motors LLC (GM) appreciates the opportunity to provide input on the Supplement to the California ZEV Investment Plan and would like to encourage California to approve the plan to increase the availability of critically-needed electric vehicle (EV) charging stations. There are currently over 300,000 EVs registered in California, and in order to grow the EV market and attract even more advanced transportation technologies to the state, California needs a charging infrastructure network that addresses consumer and industry concerns.

Automakers have made enormous investments in the electrification of transportation – GM alone has invested billions of dollars to develop electrification technologies. However, this advanced technology will require more widespread charging infrastructure to convince consumers that EVs can be driven anywhere they need to go. This is particularly true for potential EV drivers who lack access to home charging. Thus the urgency to rapidly expand EV charging infrastructure both in California and across the country.

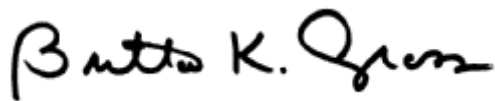
Electrify America's Plan represents a unique and valuable opportunity. The plan for California calls for a \$75 million network of fast chargers linking prioritized metro areas and covering underserved long-distance routes. This plan is the sort of broad, coordinated investment that visibly inspires consumer confidence in the driving range, and practicality, of EVs. A 2016 survey of 2,500 consumers by Altman Vilandrie & Company found the top reason customers gave for not wanting to purchase a plug-in electric vehicle was a perceived lack of charging stations (85%). Highly visible EV charging (particularly SAE industry standard DC fast charging) can help address this consumer perception issue.

Electrify America's investments also aim to improve and simplify access to charging. The Plan and Supplement call for a simple, pay-as-you-go access to charging that doesn't require a pre-existing relationship with a charging network operator. As noted in Appendix C of the Partial Consent Decree, the station network should include "DC fast charging facilities accessible to all vehicles utilizing non-proprietary connectors" and the Supplement states that "all Californians who drive a ZEV will be able to benefit from this network."<sup>1</sup> GM believes that "accessible" implies that all Californians who drive an EV will have the ability to charge at fair and reasonable prices. Electrify America has also indicated a commitment to use open protocols and maximize interoperability between charging networks. This broad commitment to increased access, simple payment options, and interoperability should benefit all EV drivers and appeal to more mainstream customers.

This is a crucial time for the EV market as both industry and policymakers work to broaden the appeal of EVs beyond early adopters. EV charging infrastructure is vital to the growth of the EV market and will lead to long-lasting emissions reductions that increase over time as the market expands. GM views the proposed Electrify America investments in charging infrastructure as a valuable opportunity to advance the overall EV industry and accelerate market growth.

GM greatly appreciates California's commitment to support the strategic transition to transportation electrification and all efforts to help drive this emerging market.

Sincerely,



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<sup>1</sup> VW Partial Consent Decree, Appendix C, page 3. <https://www.epa.gov/sites/production/files/2016-10/documents/amended201partial-cd.pdf>;  
Electrify America. *Supplement to the California ZEV Investment Plan, Cycle 1*. June 29, 2017, page 18.  
[https://www.arb.ca.gov/msprog/vw\\_info/vsi/vw-zevinvest/documents/california\\_zev\\_investment\\_plan\\_supplement\\_062917.pdf](https://www.arb.ca.gov/msprog/vw_info/vsi/vw-zevinvest/documents/california_zev_investment_plan_supplement_062917.pdf)