



Plug In America
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California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Comments on the Electrify America Cycle 2 ZEV Investment Plan

October 26, 2018

Dear Chair Nichols:

On behalf of the plug-in electric vehicle (PEV) drivers we represent in California, Plug In America would like to thank you for this opportunity to provide feedback on the proposed Cycle 2 Zero Emission Vehicle (ZEV) Investment Plan from Electrify America.

Plug In America is the nation's leading independent consumer voice for accelerating the use of PEVs in the United States to consumers, policymakers, auto manufacturers and others. Formed as a non-profit in 2008, Plug In America provides practical, objective information collected from our coalition of plug-in vehicle drivers through public outreach and education, policy work and a range of technical advisory services. Our expertise represents the world's deepest pool of experience of driving and living with plug-in vehicles, affording us a unique perspective on how consumers think about PEVs and what actually inspires a consumer to purchase a PEV.¹

The PEV market is quickly growing in California, but needs continued support from policies and programs that will help to fully transition the PEV market from the early adopter stage to the mass market stage, and to achieve the goal of 5 million ZEVs on the road by 2030. We applaud California's strong leadership with supportive policies and programs, including the strong leadership from the California Air Resources Board (CARB) to promote PEVs through all its programs. Overall, Plug In America supports the Electrify America Cycle 2 ZEV Investment Plan. We respectfully offer the following comments and small changes to the plan in order to maximize and optimize the \$200 million investment:

- 1. Plug In America supports the residential fuel infrastructure investment and the programs proposed. However, we strongly encourage Electrify America to partner with organizations like Plug In America to leverage existing resources on consumer-facing tools, such as the PlugStar consumer-to-dealer engagement program.**

Under the residential fueling infrastructure proposed program (\$8-12M), Electrify America proposes to offer "no money down" residential chargers and installation to customers who cannot pay for a Level 2 charger up front. Electrify America also proposes to develop a demand response platform to allow

¹ More information available at: www.pluginamerica.org



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drivers with a home charger to earn financial rewards for plugging in and supporting grid stability. We largely support these programs and look forward to working with Electrify America on further program details and implementation.

In addition, Electrify America proposes to, “Develop an online tool that promotes and connects EV buyers with the wide range of residential charging incentives and rebates already available in California, and consolidates the process of applying for these programs. Electrify America plans to integrate its tool with the ‘One-Stop-Shop’ tool for low-income car buyers that will soon be built as a result of funds provided by Volkswagen to address barriers to ZEV adoption in low-income communities. Together these offerings will provide customers support throughout the entire purchase process.”

Plug In America already has a tool – PlugStar.com – with much of this functionality available to consumers today. Modeled after popular 3rd party car shopping sites like Edmunds and Kelley Blue Book, it addresses the many new considerations PEV customers face in a familiar, brand neutral setting. The site informs customers of available charging incentives and rebates, helps determine their eligibility, and connects them with qualified PEV dealers. Electrify America, through its *Plug Into the Present* PEV awareness campaign, currently directs between 400 and 800 unique visits to PlugStar.com daily, revealing analytics and insights that will soon definitively tell us the impact on actual PEV sales. We urge Electrify America to support enhancement of PlugStar.com to include consolidating the many application processes now in play to accelerate delivery of these features to consumers. Leveraging this consumer engagement tool, and supporting the dealer training that Plug In America offers will stretch the Settlement funding further to the benefit of all Californians.

- 2. Plug In America supports the \$17 million for education, outreach and awareness activities in California. We very strongly encourage Electrify America to work with existing organizations like Plug In America on these activities, and to support existing education and awareness campaigns such as National Drive Electric Week, Drive Electric Earth Day and the PlugStar consumer-to-dealer engagement program. PlugStar trained sales staff are twice as likely to sell a PEV. We support the Appendix 2 “Memberships and Sponsorships” recommendations.**

One of the barriers to greater adoption of PEVs is the lack of awareness by the consumer on the number of makes and models of PEVs available, the options to charge and the cost savings that PEVs provide to the driver. We know that consumer behavior studies show that consumers will not participate in new methods of transportation and technology without having a certain level of comfort with the technology first. One of the core activities of Plug In America is to address this lack of awareness and to educate potential consumers through nationwide education and awareness campaigns such as National Drive Electric Week and Drive Electric Earth Day.



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Plug In America supports two programs that have been an enormous success nationwide in encouraging the adoption of PEVs: National Drive Electric Week (NDEW) and Drive Electric Earth Day (DEED). Plug In America, with partners Sierra Club and the Electric Auto Association, is the co-organizer for NDEW and has supported more than 1,300 events in the past eight years. Since 2011, when NDEW started as National Plug In Day, cities large and small throughout California alone have held more than 180 events, with 110 of those events in the past 3 years alone, totaling 17,870 PEV test drives and leading to positive consumer exposure to PEVs. This past year, there were more than 46 events in California, providing exposure to over 20,300 potential PEV drivers, and more than 5,000 reported test drives. Notably, NDEW also reached hundreds of people in disadvantaged communities, including Watts and in the port adjacent communities.

Local events are run by a "City Captain," usually a PEV driver. NDEW facilitates comfortable peer-to-peer conversations between non-PEV drivers and PEV drivers. The non-PEV drivers learn about the vehicles through a non-sales setting about the ease of charging, maintenance, safety, cost, performance, and range of the vehicles. These conversations are invaluable for converting a non-PEV driver into a PEV driver. In addition to direct hands-on-experience, NDEW raises awareness about the existence of PEVs among consumers by garnering significant mainstream and social media coverage.

Drive Electric Earth Day is a new program by Plug In America, the Sierra Club and the Electric Auto Association, and will run very similarly to the NDEW program. Plug In America plans to leverage the existing brand recognition and platform with NDEW to be able to double the number of events in California (and across the nation) in a calendar year, and to expose more potential customers to PEVs.

As mentioned above, Plug In America manages a dealer training program in connection with the PlugStar consumer-to-dealer engagement program. We encourage Electrify America to directly support this program, and utilize the existing expertise and resources created, as preliminary data shows that PlugStar trained sales staff are twice as likely to sell a PEV.

Therefore, we strongly support the Electrify America Appendix 2 "Memberships and Sponsorships" outline to enable Electrify America to work with existing organizations on education and awareness campaigns and programs. We recommend that CARB allow for these memberships and sponsorships - there is no need to recreate the wheel and develop similar programs.

3. Plug In America supports the infrastructure investments outlined in the proposed plan but strongly encourages the public fast charging locations to support a balance of CCS and CHAdeMO plugs.

In asking our drivers for feedback on the Electrify America DCFC stations installed so far under Cycle 1, the most common complaint was that there is not a balance of CCS plugs and CHAdeMO plugs at the



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DCFC stations. On page 45 of the Cycle 2 plan, Electrify America states, "All public facing fast charging locations will support both CCS and CHAdeMO connectors." Anecdotal evidence suggests that for every 3 CCS chargers, there is only 1 CHAdeMO charger. If that CHAdeMO charger is in use or broken, the consumer is inconvenienced, particularly when the PEV driver was counting on being able to charge at the location. We strongly encourage Electrify America to seek an equal balance of the type of plugs available to all PEV drivers at their DCFC stations.

We are happy to answer any questions you may have. Please send any questions to Katherine Stainken, Policy Director, at kstainken@pluginamerica.org.

Best regards,

A handwritten signature in blue ink that reads "Joel Levin".

Joel Levin
Executive Director
Plug In America