

October 17, 2018

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

**RE: Electrify America California ZEV Investment Plan: Cycle 2**

I write on behalf of the City of San José to express our support for Electrify America's proposed California ZEV Investment Plan: Cycle 2 (2019-2022). Electrify America's proposed plan will increase awareness of and access to ZEVs, particularly in low-income and disadvantaged communities; expand opportunities for charging these vehicles; and facilitate shared-use of ZEVs. Achieving these objectives are essential to meet California's and San Jose's greenhouse gas reduction targets. San Jose's *Climate Smart* plan, which puts the City on course to meet the Paris Accord reduction goals, relies in large part on the electrification of transportation and increased utilization of shared, clean mobility options.

While Electrify America's plan includes a number of laudable components, the City wanted to call particular attention to a handful.

Metro Area Focus: Focusing infrastructure investment in the six metro areas targeted in Cycle 1 plus three new areas with high concentrations of low-income and disadvantaged communities. This approach provides the best return on investment for the state given that these nine metro areas account for 89% of expected battery electric vehicle (BEV) operation through 2022. The decision also channels critical resources to low-income and disadvantaged communities.

Shared and Multi-Unit Charging: Installing some of the metro-area fast chargers to target those who live in multi-unit dwellings as well as shared mobility drivers (car share, taxis and those who work for ride-hailing services, such as Uber and Lyft). Doing so expands the market for ZEVs and promotes shared mobility.

Tools to Improve Access: Creating tools and programs to make it easier for those considering purchasing or leasing a ZEV, particularly lower-income consumers. This includes: Creating an online tool to inform EV buyers about the array of currently available residential charging incentives and rebates in California and simplifying the process to apply for these programs;

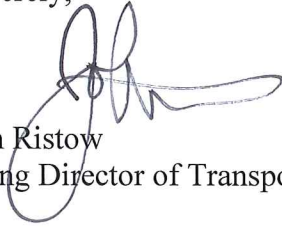
Offering a 'no-money-down' residential charger and installation program, enabling buyers to repay the cost over time; and

Developing a demand response platform to allow drivers to earn financial rewards for plugging in at home and supporting grid stability.

Education and Awareness: Investing approximately \$17 million in ZEV education, awareness, and outreach activities. While the state has actively promoted ZEVs, installed electric vehicle chargers, and offered purchase incentives, research by UC Davis indicates that California consumer awareness of ZEVs and the availability of chargers has been largely static. Major investment is needed to increase awareness about ZEVs.

In sum, the package of programs and tools Electrify America has proposed for its Cycle 2 California ZEV Investment Plan are sound and essential. We urge the California Air Resources Board to approve the plan as proposed.

Sincerely,

A handwritten signature in blue ink, appearing to read 'John Ristow', with a long horizontal flourish extending to the right.

John Ristow  
Acting Director of Transportation