



April 10, 2017

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

**Re: Comments in support of CARB's approval of Electrify America's California ZEV Investment Plan**

Greenlots appreciates the opportunity to comment on the Board's review of Electrify America's California ZEV Investment Plan.

The Volkswagen (VW) settlement decree represents a unique opportunity to accelerate the electric vehicle market in California. Expanding this market 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 and the other parties to implement the requirements of the existing settlement as soon as possible and approve Electrify America's California ZEV Investment Plan.

We shared the sentiment above and that following in a March 20 letter to Chair Nichols, along with other companies in the EV charging market, including EVgo, Efacec, BTC Power, SemaConnect, and Aerovironment. More recently, EV Box has also joined these voices.

Greenlots has also shared this sentiment with numerous legislative offices, and most recently met with Senator De Leon's office along with EVgo, BTC Power, and Clean Fuel Connections. While the Investment Plan isn't perfect, we think that it is in line with the settlement decree and in the spirit of CARB's guidance offered in December 2016 and this February. Indeed, we think it strikes an important (if delicate) balance between deep support of disadvantaged communities, and making the business case for infrastructure investments. Like others, we look forward to seeing more detail around Electrify America's support for disadvantaged communities, but feel that the Plan signifies a good first step.

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. Along with the rest of the settlement, we believe that Appendix C is an effective mechanism to hold VW accountable for its actions, while also achieving important public benefits. In particular, we believe the provisions of the existing settlement have the following benefits:

- Enables California's Transportation Policy Goals: Many of California's landmark transportation policies (tailpipe emissions standards, the ZEV mandate, and the LCFS) require or benefit from expanded deployment of EVs and other ZEVs. That need is reflected in California's current target to put 1.5 million ZEVs on the road by 2025. The

VW settlement will help enable all of these policies by expanding access to public charging to reduce range anxiety at a critical point when many mass-market EVs are starting to enter the market. By enabling California's transportation policy framework, the settlement will help deliver broader consumer and public health benefits for all California residents.

- **Requires Broad Geographic Deployment:** The settlement requires VW to make investments across a variety of cities, metro areas, and types of locations, such as workplace, multi-family, and other public locations. This will ensure maximum access for existing and future EV drivers, including high speed charging on highways and public chargers in workplaces, multi-family dwellings, and community settings, such as grocery stores and shopping malls.
- **Expands Access to Public Charging Infrastructure:** VW has stated its commitment to installing public DC-fast charging and Level II charging as part of the ZEV Investment Commitment. Range-anxiety is still a major adoption barrier for consumers and expanding public charging infrastructure is a critical step to addressing this concern. Further, the settlement specifically prohibits eligible investments at or adjacent to VW dealerships.
- **Supports Disadvantaged and Low-Income Communities:** In addition to requiring a broad geographic and site distribution (e.g. multi-unit housing) of charging infrastructure, the settlement directs VW to make investments that will benefit disadvantaged communities in two ways. First, it encourages EV charging infrastructure for heavy-duty trucks, freight transport and transit, which are a major source of diesel air pollution that disproportionately affects disadvantaged communities. Second, it encourages wider access to EVs by directing investments at programs that increase public access to ZEVs through car-sharing, ride-hailing services and other mechanisms to allow low-income customers to acquire a ZEV.
- **Creates Jobs:** The California ZEV Investment Plan will result in exponential expansion of electric vehicle infrastructure well beyond the existing approved deployments. This will create good-paying jobs throughout California in construction, electric utilities, system installation, system operations, and maintenance.
- **Ensures Appropriate State Oversight of VW's Investment Plans:** Under the terms of the settlement decree, CARB must review VW's 30-month investment plans. It then has the discretion to approve or disapprove specific elements of the plan to ensure compliance with the requirements of the settlement decree. This ensures that the State will have an appropriate oversight role while still providing the market certainty and efficiency necessary for market participants to support these investments.

- **Requires Technology-Neutral, Non-Proprietary Standards:** The settlement requires VW to install EV charging infrastructure that supports multiple, non-proprietary connectors, open network communication protocols, and charging protocols that anticipate the evolving field of EV charging. As an example, VW has stated that it will support all broadly accepted standards for Level II and DC-fast charging. This includes supporting CHAdeMO DC-fast charging connectors, even though VW does not plan to support CHAdeMO in its own vehicles.
- **Preserves Fair Competition:** VW has stated that it will work with multiple, qualified vendors to achieve the requirements of the California ZEV Investment Plan and it will make those decisions based on competitive processes. California has always been a global leader in moving the automotive market towards a cleaner, more efficient future. The VW settlement represents another unique moment for California to push forward and jumpstart broad adoption of EVs and other ZEVs. We are concerned that some have raised objections and proposed delays to implementing the settlement. We firmly believe that our state, our industry, and our planet, cannot afford any unnecessary delay and we urge you to move forward as quickly as possible under the existing terms of Appendix C and require VW to fulfill its obligations under the current California ZEV Investment Plan.

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 'T Ashley', with a stylized, flowing script.

Thomas Ashley  
Senior Director, Government Affairs & Public Policy  
Greenlots