December 16, 2016

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

RE: Recommendations for the Volkswagen Settlement Investment Priorities

My name is Richard Teebay. I am employed by the County of Los Angeles. I served as Co-Chair of the Southern California Association of Governments' (SCAGs) Plug-In Electric Vehicle (PEV) Coordinating Council. I have been in Fleet Management for more than 40 years and have been a member of the National Association of Fleet Administrators (NAFA) for more than 30 years. I have served as the Chair of the NAFA Pacific Southwest Chapter and as Chair of NAFA's (National) Fuels and Technology Committee. I am a Co-Chair of the Los Angeles Economic Development Corporation's e-4 Mobility Alliance (formerly the e-Mobility Task Force). We are committed to making the region a leader in the electrification of transportation and autonomous vehicles. The region must be a leader, not just a consumer of these technologies.

I am not writing you today not as a representative of my employer, e4, the LAEDC, SCAG, or NAFA. I am writing you as a private citizen who professionally and privately has been actively engaged in creating and recreating the EV infrastructure within the Los Angeles region for more than half a decade. I am working with a leadership group of more than a dozen public fleets and agencies from throughout the Los Angeles Region including the counties of Riverside, San Bernardino, and the cities of Anaheim, Long Beach, and Palmdale.

Thank you for allow me to submit comments on the funding strategies and priorities for the first phase of the Volkswagen (VW) Settlement.

On Friday, December 2, 2016, the staff of the Air Resources held a workshop in Sacramento to obtain public input regarding the first of four Zero Emission Vehicle (ZEV) Investments from the VW Settlement for the 2.0 L diesel engine emissions. While the workshop was webcast, Southern California governments and especially their public fleets were not well represented.

By population, the Southern California Association of Governments' six county region – Los Angeles, Orange, Riverside, San Bernardino, Ventura and Imperial comprise more than 48% of the State's population. When Santa Barbara County is included, these seven counties are home to half the State's population. Based upon population, the

Southern California Region should receive a minimum of 50% of the $200 million in first round funding – a minimum of $100 million.

The Southern California region consistently suffers the worst air pollution in the State and the nation.

Almost 44% of all the goods that come into the United States come through the Region's twin ports of Los Angeles and Long Beach. The region's ports are both an important economic driver and a significant source of air pollution. Many of the communities identified as Disadvantaged by the State's Enviro-Screen tool are adjacent to the ports or adjacent to the highways leading to and from the ports.

The San Francisco Bay Area were early adopters of Plug-in Electric Vehicles (PEVs), with PEVs now approaching 10% of the new car market in the Bay Area. Studies from International Council on Clean Transportation, and the University of California at Davis' Institute of Transportation Studies have confirmed that public charging infrastructure supports and increases PEV sales and adoption. A neighbor, a coworker, and/or the availability of public and/or workplace charging infrastructure are the most influential tools for raising awareness and increasing the number of zero emission vehicles.

One example: in the summer of 2014, the County of Los Angeles' Department of Public Works resurrected its EV infrastructure (11 Level 2 EVSE) from the late 1990s. During July 2014, there were 244 sessions and 2,154 kWh dispensed. During July 2016, there 565 sessions and 9,162 kWh were dispensed, more than a fourfold increase in kWh. For the month of November, 2016, the County's 140 Level 2 EVSE had 5,400 sessions and dispensed 66,000 kWh.

The San Francisco Bay Area has twice the charging infrastructure and half as many PEVs as the Los Angeles region. Currently, in the Los Angeles region there are 18 PEVs for each public charging station. In other words, public and workplace charging infrastructure in the Los Angeles region is woefully inadequate. Commutes in the Southern California region are also longer than commutes in the Bay Area. For example, the County of Los Angeles has more than 101,000 employees. The average employee's commute is 24 miles *one way*. This means that half of the County's employees have a commute *longer* than 48 miles each day. People will not purchase and do not drive vehicles that will not get them back and forth to work.

Currently, the 51% (1,018 of the 1,994) census tracts identified within California as Disadvantaged Communities are within the County of Los Angeles. More than 4.3 million more than 40% of the County's 10.2 million residents and 11% of the State's entire population live in these communities. We recognize that to truly have impact beyond the City of Los Angeles, or the County of Los Angeles, we need to advocate for a regional approach, a regional program, and a regional solution that advances the adoption of Zero Emission Vehicles.

This letter/request focuses on just zero emission infrastructure and specifically, public, workplace and public fleet charging. While multi-family is very important in the long term, it is far more challenging. We are advocating for quicker solutions that will make lead to significant gains in PEVs market share in Southern California. If by 2020, Southern California has the same level of public and workplace charging infrastructure as the Bay Area enjoys, if we can eliminate the infrastructure deserts within the Los Angeles region, we believe that PEVs will be 10% of new vehicle market by 2020. Because of the region's large population and percentage of new vehicle sales, the region is the State's greatest challenge and its greatest opportunity. Let's significantly Move the Needle in LA.

We recognize that the EnviroScreen is an imperfect tool. It may not recognize and account for gentrification of some formerly Disadvantaged Communities and/or that it may under represent the needs of other communities. While some communities are experiencing change, the vast majority of communities with infrastructure "deserts" or significant infrastructure deficiencies are readily apparent. Furthermore, the public health impacts in these communities remain the same.

Recommendations:

Funding for ZEV infrastructure should be distributed regionally and by population.

- The Los Angeles Region should receive half (50%) or 100 million for PEV infrastructure.
- For the Settlement's first $200 million, funding for Disadvantaged Communities and to the benefit of Disadvantaged Communities (25% and 10% respectively) should be distributed proportionately based upon current CalEnviroScreen 2.0 as required for State funding by SB 535. This provides time for the State to refine the screening and/or evaluation criteria without delaying this first round of funding.
- The Los Angeles region's funding should encourage and should be structured to leverage funding from other sources such as Federal programs and tax credits, the Southern California Edison (SCE) Charge Ready Program, Los Angeles Department of Water and Power rebates, Energy Commission (CEC) funding, South Coast Air Quality Management District (AQMD) matching funds, etc.
- In the Los Angeles region, the data from the AQMD's Rule 2202 should be used to identify large worksites (250 employees or more in four counties, Los Angeles, Orange, Riverside and San Bernardino) and overlaid with the CalEnviroScreen 2.0. Employee and visitor parking areas at these sites, as well as light duty Fleets should be targeted. (Fleet charging infrastructure funding should be based upon annual mileage or vehicle fuel use and could offer significant benefits.)
- Create a Rebate Program. A Rebate Program for private for profit firms would be similar to the Air Resources Board's Clean Car Rebate Program. The firm or agency would reserve a rebate, install the EVSE, and submit proof of purchase and installation, and be reimbursed subject to program limits.

- Create a Direct Install Program with Certified Contractors, especially for government agencies and non-profits. Contractors would perform a site assessment. The assessment and recommendation would be submitted to the property owner. If approved, it would be submitted to VW for approval. When approved by VW, the contractor obtains the permits, performs the installation, and bills VW directly up to the limit for the site. Each site host will pay any additional costs and/or supplement through other funds/programs. This will make it much easier for public agencies and non-profits, especially in Disadvantaged Communities, to benefit from this settlement.
- If non-networked EVSE are installed, they shall be on a separate meter or sub-meter and their usage reported.
- If networked, all EVSE shall be included/approved by Southern California Edison Charge Ready Program. The EVSE shall be non-proprietary and Open Charge Point Protocol (OCPP) Compliant – open source – to eliminate "vendor lock-in."
- Funding shall be per Plug not per EVSE to encourage the use of dual (two plug) EVSE when they make sense. (Dual plug EVSE are typically a little less costly and less labor intensive to install.)
- All EVSE, DCFC shall be warrantied for three years from the date of commissioning. Networking fees for the first three years shall be included.
- Leverage existing programs and resources.
    - The SCE Charge Ready Program includes a broad range of qualified charging station models from multiple suppliers. All (networked) Level 2 stations are capable of Demand Response and will be able to participate in future Demand Reduction programs. (The EVSE and networks are capable of curtailment.) This is a "living" list and suppliers and devices. The listing of EVSE and networks will be added periodically.
    - Southern California Public Power Authority (SCPPA), a southern California Joint Powers Authority of twelve municipal utilities, and the State of California's General Services Department have solicited for EVSE and networks.
    - Local government agencies should be encouraged to use (piggy-back) these resources (SCE Charge Ready, SCPPA, GSA) where practical.

There should be four levels of funding:

- The base level of funding for large for-profit business, such as Disney, Chevron, etc. (base amount)
- A second level of funding for mid-sized and smaller businesses (base plus 50%).
- A third level of funding for public agencies and non-profits sites (base plus 100%).
- And a fourth level of funding for public agencies and non-profits sites within or immediately adjacent to Disadvantaged Communities (base plus possibly 200%)

Because many existing sites lack adequate electrical service, installations can become very expensive. The State of California's new Americans with Disabilities (ADA) requirements makes public and workplace Level 2 EVSE at existing sites even more problematic and expensive. (ADA does not apply to Fleet charging.) Because of the electrical supply and ADA requirements, it is recommended that there be a minimum of 8 to 10 EVSE or EVSE make-readies installed per site and that there be bonus (double or triple funding) the funding for the two ADA spaces at public or workplace sites. If more than 25 spaces, this ADA bonus shall double.

> Example: A site installs 10 Level 2 plugs in mixed use workplace/public access spaces. The first two spaces must comply with new ADA requirements. Each plug is eligible for $5,000 rebate/direct install. Each of the two ADA accessible spaces would be eligible for up to $10,000 or $15,000 per space. The site would be eligible for up to $60,000 or $70,000 for the ten plugs installed – but not to exceed actual costs.

We also recognize that the Central Valley also suffers greatly from poor air quality and the economic impacts of the State's ongoing draught.

We strongly believe that the VW Settlement funding for Public and Workplace Charging infrastructure can transform the new car market in Southern California. This will electrify the drive in the State and the Nation.

Thank you for allowing me to submit my comments on the VW Settlement.

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