

December 7, 2018



To: [Mark Williams, mwilliam@arb.ca.gov](mailto:mwilliam@arb.ca.gov)  
[Elise Keddie, elise.keddie@arb.ca.gov](mailto:elise.keddie@arb.ca.gov)

Dear Mr. Williams and Ms. Keddie,

The Electric Auto Association's mission is to facilitate the widespread adoption of Electric Vehicles. Members of the EAA's board have reviewed Electrify America's Cycle 2 proposal and would like to offer our support of Cycle 2 and further suggestions as outlined. Specifically:

1. The EAA concurs with Electrify America's Cycle 2 Plan that balances out investment between primary and secondary corridors. The EAA believes focusing on primary travel routes is the best value to accelerate EV adoption. A proportionately scaled deployment of DCFC infrastructure along secondary and tertiary roads is appropriate.
2. Regarding funding of hydrogen refueling stations, the EAA believes that the current proposal of "*Electrify America will continue to accept and evaluate investment (not grant) opportunities in hydrogen fueling throughout Cycle 2*" is the correct path. It is the view of the EAA that the huge disparity between FCEV and BEV adoption vis-a-vis the cost of the infrastructure of these two technologies does not warrant using Cycle 2 funds for hydrogen refueling stations. In terms of "return on investment" to accelerate the adoption of electric vehicles, the market has spoken. Consumers prefer the simplicity of the BEV and the ability to "refuel" at home and focusing on DCFC infrastructure is the most prudent course of action.
3. The EAA also supports Electrify America's proportion of "manufacturer agnostic" plug types. The future is coming into focus that CCS will be the preferred interface for cars sold in North America, with the exception of Nissan and Tesla. As such, the EA views the current proportion of CCS to CHAdeMO as appropriate.

Overall, the EAA is pleased with the deployment so far on Cycle 1.

Respectfully,

A handwritten signature in black ink that reads "Raejean M. Fellows".

Raejean Fellows, President  
Electric Auto Association