



April 10, 2017

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Volkswagen (VW) ZEV Investment Plan: Appendix C

Dear Chair Nichols and Board Members,

BMW of North America (BMW NA) is pleased to submit comments on the Volkswagen ZEV Investment Plan relative to Appendix C. BMW NA believes in alignment with the impetus for the investment plan that EV charging infrastructure must be accessible to all drivers. Moreover, efficient consumer awareness of electric vehicles and charging infrastructure is critically important to grow the ZEV market.

The Volkswagen (VW) ZEV Investment Plan – prescribes neutral consumer education coupled with the expansion of accessible charging infrastructure throughout California in a variety of public places, multifamily dwellings, communities and workplaces, including underserved communities. The proposed actions under this Plan would indeed be a pivotal stimulus to achieve these goals. They would help mitigate any general public perception that the current batch of electric vehicles and supporting public infrastructure are not sufficiently developed to be suitable for most California drivers. The proposed Plan offers a strategy to address the significant market needs for a robust charging infrastructure together with public awareness and understanding of the ZEV benefits. However, given the importance of the infrastructure to BEV adoption, we have to be cognizant of the potential issues concerning an electrification program that is dependent on and controlled by just a single auto manufacturer. It is important for other electric vehicle manufacturers to protect their customers' data, customer experience and customer support in a manner that ensures no undue competitive advantage for VW.

VW's Investment Plan should complement current market-based investment interests and existing charging infrastructure. It should focus on areas with the highest ZEV demand where demonstrated EV interest does not already exist, or is not as strongly demonstrated. Additionally, a single OEM controlling areas of deployment and customer experience, should not be afforded an implicit comparative advantage through its ability to control day-to-day operations of consumer charging events (queuing, reservation, pricing, billing and payment or integration into mobility platforms). Instead, VW should work directly with other OEMs to ensure a mutually beneficial customer process that will support the goals of the other OEMs as well as a supported customer experience. The State of California, in particular, has long been a leader in developing the market for EVs, and BMW is confident that these concerns are considered.

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BMW NA is directly investing millions of dollars per year in publicly accessible fast charging infrastructure. In that process, BMW NA has sought out and developed successful partnerships with several of the top network operators in the U.S. BMW NA has directly supported the installation and availability of hundreds of fast chargers nationwide, through multiple projects. More is needed, however; the continued strategic expansion of accessible charging infrastructure is crucial to secure future adoption of ZEVs. The charging infrastructure provided under the Plan will further support the successful sales volume of the industry-leading BMW i and BMW iPerformance plug-in hybrid vehicles in California. A critical component to growing the EV market will be a focus on multi-unit dwellings where charging installation can be challenging. Additionally, widespread consumer education remains critical.

The State of California, in particular, has long been a leader in developing the market for EVs, and BMW NA has been an active supporter and partner of its vision and goals. Through forward-looking, financially sustainable programs such as the VW ZEV Investment Plan, California continues to proactively build upon its global leadership position. BMW NA encourages and supports investments in electric vehicle infrastructure programs that further promote equitable OEM and consumer public charging infrastructure accessibility, driver education, awareness, and a clear strategy for installation and operation through a long-term business plan that fosters charging industry competition. BMW NA believes the ZEV Investment Plan Appendix C will benefit current and future ZEV drivers directly, while supporting the growth of that segment.

Thank you very much for considering BMW NA's comments and please feel free to contact me at angela.konert@bmwna.com by telephone (916) 476-5688, or my colleague Robert Healey at Robert.healey@bmwna.com or via telephone at (201) 571-5114 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink that reads 'Angela Konert'.

Angela Konert
Vice President Government and External Affairs
BMW Group Representative Office California