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Mark Toney, Ph.D., Executive Director

April 10, 2017

Mary Nichols  
Chair  
Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, California 95812

**Re: Volkswagen ZEV Investment Plan**

Dear Chair Nichols,

The Utility Reform Network (TURN), a consumer advocacy organization that has fought on behalf of California residents for more than 40 years, supports your efforts to hold Volkswagen accountable for the use of illegal defeat devices in its 2.0-liter diesel cars sold in California from model years 2009 to 2015. TURN advocates on behalf of residential and small business ratepayers at the California Public Utilities Commission (CPUC) and has approximately 20,000 dues-paying members, of whom we believe the vast majority are residential ratepayers.

TURN has actively participated in the transportation electrification proceedings at the CPUC. TURN supports limited targeted ratepayer investments in transportation electrification infrastructure that leverage public and private investment. The Volkswagen settlement provides a significant opportunity for private investment in electric vehicle (EV) charging infrastructure in California that can fill existing gaps and enable more widespread adoption of EVs. TURN has reviewed Volkswagen's first 30-month Zero Emission Vehicle (ZEV) Investment Plan and provides the following recommended modifications to the Plan.

1. Require a specific commitment by Volkswagen to installing charging stations directly in disadvantaged, low-income, underserved and disproportionately impacted communities.
2. Require coordination with existing and proposed utility transportation electrification programs.

## **Commitments to Disadvantaged, Low-Income, Underserved and Disproportionately Impacted Communities**

TURN was pleased to see that CARB's Guidance for the First 30 Month ZEV Infrastructure Investment Plan urged Volkswagen to "dedicate a significant percentage (at least 35%) of the funds for investment in disadvantaged, low-income, underserved and disproportionately impacted communities identified in consultation with state agencies." Unfortunately, the proposed ZEV Investment Plan does not currently commit to this level of investment.

TURN appreciates the inclusion of disadvantage communities in the High-Speed Highway Network component of the ZEV Investment Plan but we are concerned that the Community Charging proposal does not include specific commitments to deploy charging infrastructure in disadvantaged communities. The Community Charging component is limited to the five metropolitan areas of San Francisco, San Jose, Los Angeles, Sacramento, and San Diego. These areas have seen the most private investment in EV charging infrastructure and are the most attractive markets for private investment. While there are disadvantaged communities in these metropolitan areas, many of the communities in the top quartile of most impacted communities identified by the CalEnviroScreen tool are located outside of these major metropolitan areas.

Volkswagen's investment should be focused on underserved markets, areas where private investment has been slow or nonexistent. TURN recommends that the ZEV Investment Plan be modified to include a designated commitment in the Community Charging component to invest in the parts of the state that need this funding the most, low-income and disadvantaged communities. TURN also recommends a focus on installations in multi-unit dwellings in low-income and disadvantaged communities because access to at-home overnight charging is key for EV adoption. Installing charging stations in low-income and disadvantaged communities would complement existing state programs and utility investments and could lead to more ZEV adoption by low and middle income drivers, especially as more used EVs become available.

## **Coordination with Existing and Proposed Utility Transportation Electrification Programs**

All three of the large regulated public utilities in California (SCE, SDG&E & PG&E) are implementing EV charging infrastructure programs and, pursuant to Senate Bill 350, also recently submitted proposals for large-scale transportation electrification investment programs. All three of the utilities' SB 350 proposals include investments in high-speed charging, which may overlap with the High-Speed Highway Network proposal in the ZEV Investment Plan. The utilities' SB 350 proposals also include

education and outreach proposals that should be coordinated with the Brand-Neutral Education Activities proposed in the Plan. TURN requests that CARB require Volkswagen to coordinate with the existing and pending utility EV charging investment programs when implementing the Plan in order to prevent duplicative spending and to ensure Volkswagen's investments have the most significant impact possible on transportation electrification in California.

TURN supports CARB's hard work and dedication in this matter and encourages CARB to continue to ensure that the Volkswagen Settlement includes meaningful investments in EV charging infrastructure that will increase EV adoption, especially in low-income and disadvantaged communities. TURN requests that CARB modify the Plan to require: 1) 35% of the infrastructure investment go to disadvantaged, low-income, underserved and disproportionately impacted communities; and 2) all investments pursuant to the Plan be coordinated with utility transportation electrification investments and programs.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Toney". The signature is fluid and cursive, with the first name "Mark" being larger and more prominent than the last name "Toney".

Mark Toney

Executive Director  
**The Utility Reform Network**