

October 19, 2018

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

Comments on Electrify America's California Cycle 2 Zero Emission Vehicle Investment Plan

Dear Mr. Williams,

The Center for Sustainable Energy® (CSE; www.energycenter.org) appreciates the opportunity to offer comments on Electrify America's California Cycle 2 Zero Emission Vehicle (ZEV) Investment Plan (Cycle 2 Plan).

CSE is a mission-driven nonprofit organization accelerating the adoption of clean transportation and energy technologies. We provide program administration, on-the-ground implementation, technical assistance, and policy advisement. In clean transportation, we work with vehicle consumers; state, regional, and local governments; dealers, original equipment manufacturers (OEMs), and auto associations; charging suppliers and utilities; public and private planners; and other stakeholders to support the transition to electric vehicles and a sustainable energy future.

CSE administers the California Air Resources Board's (CARB) Clean Vehicle Rebate Project (CVRP) and the statewide plug-in and fuel-cell electric vehicle (EV) rebate programs for Connecticut, Massachusetts, and New York. CSE also administers the California Energy Commission's California Electric Vehicle Infrastructure Project (CALeVIP) and is involved in regional EV readiness planning efforts. CSE provides these comments based on its program administration, design, and evaluation experience.

CSE supports Electrify America's expansion of investment categories and continued investments in low-income and disadvantaged communities in its Cycle 2 Plan. CSE offers comments in the following areas:

1. National Outreach Effort
2. Low-Income and Disadvantaged Communities Investment Goals
3. Regional Routes and Highway Investments
4. Data Transparency and Coordination

Accelerating the transition to a sustainable world powered by clean energy

National Outreach Effort

CSE appreciates Electrify America's detailed summary of its National Outreach Effort and is pleased to see that key entities in the charging infrastructure space contributed to the development of the Cycle 2 Plan. CSE submitted comments through Electrify America's online portal and later discussed our recommendations with them in a follow-up meeting. CSE also participated in a stakeholder call where Electrify America requested feedback from equity and environmental justice organizations and others working with low-income and disadvantaged communities (DACs). Lastly, Electrify America shared their proposed plans for their Cycle 2 investments during an in-person meeting at our office. CSE appreciates Electrify America's outreach commitment, and we encourage them to continue collaborating with stakeholders throughout the implementation of the Cycle 2 Plan.

Low-Income and Disadvantaged Communities Investments Goals

CSE is pleased to see that Electrify America strives to ensure that 35 percent of its infrastructure investments will benefit DACs and low-income communities (LICs) in the state. On page 16 of the Cycle 2 Plan, Electrify America outlines its efforts towards this goal. CSE offers the following comments regarding some of these efforts:

- *Electrify America proposes to make LICs and DACs one of the criteria for site selection for all charging stations.*
 - CSE supports this criterion and encourages Electrify America to make public their selection criteria to demonstrate how this criterion is weighted in comparison to other criteria.
- *Within the Fresno, Riverside-San Bernardino and Santa Cruz metro areas, Electrify America will build stations to meet the needs of residents of multi-unit dwellings (MUDs). It will also invest to meet the fueling needs and lower fuel costs for shared mobility drivers, a disproportionately low-income population.*
 - CSE requests that Electrify America make public the metrics it will use to measure usage by MUD residents and shared mobility drivers. This will help inform best practices and shared methodologies to ensure that these charging stations are meeting the needs of these two sets of drivers.
- *Electrify America proposes to invest in EV charging stations in rural areas of the Central, Imperial and Coachella Valleys.*
 - CSE recommends that Electrify America coordinate with California Energy Commission (Energy Commission) staff working on the Fresno County Incentive Project (FCIP) and 2019 San Joaquin Valley Incentive Project, both being funded through CALeVIP.
 - CSE also recommends that Electrify America partner with community-based organizations (CBOs) in these areas to identify the charging needs of those communities.
- *Electrify America aims to reduce the cost of ZEV ownership for low-income and disadvantaged drivers by offering: 1) no-money down home charging equipment; and 2) developing a tool to connect these drivers to existing local, regional, and state charging incentives.*
 - CSE recommends that Electrify America determine that a certain percentage of recipients of the no-money down offering must be from LICs and DACs.
 - CSE also recommends that Electrify America conduct targeted outreach to these communities to inform them about this opportunity.
 - If this type of outreach to low-income and disadvantaged drivers will be conducted, CSE suggests that it include materials translated in identified languages specific for each target

community. CBOs and other community resources should be engaged to help lead this outreach.

- Regarding the online tool, CSE encourages Electrify America to use an analytic platform to track usage and to make public how the information will be compiled, e.g., by zip code, county or Census tract.
- CSE also encourages Electrify America to make public the metric that will be used to measure success for this tool. CSE suggests that this online tool be carefully designed so that the information requested is not too intrusive. Based on our experience, low-income consumers are more cautious in submitting personal data.

CSE also appreciates that Electrify America will strive to ensure that 35 percent of their brand-neutral education, awareness, and outreach investments in the state are in or target LICs and DACs. This is approximately \$6 million of the \$20 million allocated for this type of investments, which is a significant investment in these communities. CSE offers the following comments regarding some of the activities that Electrify America will undertake to meet this goal:

- *Electrify America will dedicate approximately \$2-3 million of Cycle 2 funds to supporting the programs of local entities with credibility and success in LICs and DACs.*
 - CSE suggested to Electrify America that the funding for this purpose be the same amount that was allocated in Cycle 1. CSE is pleased to see that our feedback was incorporated in the Cycle 2 Plan that was submitted to CARB.
- *Similar to Cycle 1, Electrify America will conduct “Discover and Drive” events in LICs and DACs.*
 - Based on CSE’s experience, we expect ride-and-drive events in these communities will increase consumer awareness of ZEVs. To ensure the success of future “Discover and Drive” events in LICs and DACs, CSE encourages Electrify America to partner with CBOs. CSE partners with CBOs to conduct CVRP equity outreach activities because these organizations are trusted sources of information. CBOs are also experts in providing meaningful outreach that meets their communities’ multilingual and cultural needs. CSE has found that these partnerships are more successful when CBOs are included in the design phase of an outreach and education plan prior to implementation. CSE offers to assist Electrify America with identifying and training CBOs to help ensure “Discover and Drive” events in LICs and DACs meet the access needs of those communities.
 - CSE encourages Electrify America to add the following information to its map on its website: the location of upcoming test drives, their dates and times, and list of available vehicles.

Regional Routes and Highway Investments

Direct current fast charging (DCFC) stations funded by the Energy Commission and the Monterey Bay Air Resources District (MBARD) will be deployed along the following regional routes identified by Electrify America on Table 8 (page 50) of their Cycle 2 Plan:

- CA-120/CA-41 to Sierra Mountains: Stations funded under the Energy Commission’s Grant Funding Opportunity 15-603 will be coming online in the next few months.
- CA-1/CA-101 Salinas to Santa Cruz: Stations funded by MBARD are expected to be deployed by the end of 2018.

To avoid duplicative efforts, CSE recommends that Electrify America: 1) modify its list of prioritized regional routes; and 2) redistribute funds allocated to the two referenced regional routes to other routes listed in the Cycle 2 Plan. This redistribution of funds will ensure that Electrify America investments will complement other charging infrastructure projects in the state, thus helping California meet its 10,000 DCFC goal as outlined in Executive Order B-48-18.

Data Transparency and Coordination

In its Cycle 1 ZEV Investment Plan Supplement, Electrify America indicated its intention “to share data with CARB regarding cost, utilization, and performance of ZEV investments,”¹ and to “ensure that private customer data and confidential business information are not released in these reports.”² CSE encourages Electrify America make a similar effort – and expand on it by also sharing data with the California Public Utilities Commission and the Energy Commission – as it implements Cycle 2.

CSE recommends that Electrify America make anonymous data publicly available on its website, while ensuring confidentiality and privacy. Data sharing supports regional and statewide planning, helps reduce the duplication and overlap of investments, improves awareness of charging infrastructure, and otherwise increases market momentum and EV adoption. Additionally, data sharing makes transparent the health and progress of Electrify America’s sizeable commitment to ZEV investments in California.

As the CVRP administrator, CSE has worked closely with CARB and other stakeholders to provide public data in comprehensive and easily accessible formats, while ensuring confidentiality and privacy protections. It has been CSE’s experience that public-facing data helps improve the relevance and productivity of policymaking related to program implementation. CSE appreciates that Electrify America has a map on its website showing available and upcoming charging locations, and it suggests that they provide the additional data points to refine it: numbers, type (e.g., multi-unit dwelling, workplace), technology (e.g., DC fast charging), and installation progress (e.g., completion date). We suggest this data be updated frequently (e.g., monthly), uniformly structured, zoomable, searchable by filters, and granular (e.g., to enable Census-tract-level analysis). These data characteristics will support robust market development and maximize learning.

CSE also recommends that Electrify America directly share progress updates on the status of their investments with additional state agencies responsible for California’s transportation electrification. These agencies include, but are not limited to, the California Public Utilities Commission, the Energy Commission, and the Strategic Growth Council. For the Energy Commission, CSE recommends that Electrify America meet with CALeVIP staff and Commissioner Scott.

Information sharing could be facilitated and enhanced by the establishment of an inter-agency working group and/or the creation of a third-party statewide ombudsman. Such activity would support Electrify America’s data sharing and reporting requirements established in Section 3.6 of Appendix C of the Consent Decree. Moreover, to promote transparency with all stakeholders, CSE encourages Electrify America to make information related to these coordination activities (e.g., meeting dates, summaries of updates) available on its website.

¹ Supplement to the California ZEV Investment Plan, page 31. June 29, 2017. Website access:

https://www.arb.ca.gov/msprog/vw_info/vsi/vw-zevinvest/documents/california_zev_investment_plan_supplement_062917.pdf

² Ibid.

Conclusion

CSE appreciates the opportunity to provide these comments in response to Electrify America's California Cycle 2 ZEV Investment Plan. The projects and investments outlined in this plan will help advance California's electric mobility future. CSE looks forward to CARB's decision on this plan at its upcoming November Board meeting.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Fabiola P. Lao', enclosed within a large, loopy oval shape.

Fabiola P. Lao
Senior Transportation Policy Manager
Center for Sustainable Energy®