



**Electric Vehicle Charging Association**  
INNOVATION FOR CLEAN MOBILITY

March 19, 2018

Ms. Mary Nichols  
Chair, Air Resources Board  
1001 I Street  
Sacramento, CA 95818

**RE: Comments on VW Settlement Appendix D Environmental Mitigation Trust**

Thank you for the opportunity to provide comments on the Environmental Mitigation Trust funding allocated to California under Appendix D of the VW Settlement. The Electric Vehicle Charging Association (EVCA) sees this as unique opportunity for California to bolster its investments in clean transportation, attracting private investment and improving air quality and public health.

EVCA is a not-for-profit trade organization of ten leading electric vehicle (EV) charging industry member-companies. EVCA's mission is to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the expeditious and efficient adoption of EVs and deployment of EV charging infrastructure.

A revolution is at hand. In the United States, over 699,700 new EVs hit the road since 2010—and this is just the beginning. Every major automaker has announced substantial investments in electrification of light duty vehicles. Transit and medium duty vehicle products are now competitive with combustion counterparts and major fleets across the country have announced plans for full electrification. Anticipated benefits to taxpayers and utility ratepayers are substantial, as are the economic benefits of domesticating consumer spending that is now going to overseas petroleum interests.

**Transportation electrification necessitates a robust charging infrastructure to unlock its benefits for California.** Furthermore, Governor Brown's new executive order calls for 5 million zero-emission vehicles by 2030 and 250,000 chargers by 2025, of which 10,000 are DC fast chargers. While the state has nearly 340,000 EVs on the road with over 16,000 public and nonresidential private sector charging outlets, we are still very far from reaching our goals.

*Light Duty EV Supply Equipment (EVSE)*

Appendix D of the VW Settlement allows each state to invest up to 15% of its allocation of Trust Funds on costs for the acquisition, installation, operation and maintenance of new light duty EV charging infrastructure. **EVCA recommends that California commit its full 15% allowance toward EVSE.**

However, staff has proposed only a \$10 million allocation to be shared by both EV charging infrastructure and hydrogen refueling infrastructure, citing that EV charging infrastructure does not help the state meet its 10,000+ tons of NOx reduction requirement. However, many other states use quantification methodologies that do show light-duty EV charging infrastructure does result in NOx mitigation. **We strongly encourage staff to review quantification methodologies being utilized by other states and incorporate this into their own processes.** If other states are achieving NOx reductions through deployment of EV charging infrastructure, so can California. Furthermore, should California determine that NOx reduction is not achievable through EV charging infrastructure, that will set a dangerous precedent for other states to follow, where the VW Appendix D funding is the only resource they have to deploy charging infrastructure. Considering the state's new deployment goals, California will need as much resources as possible to deploy additional infrastructure.

Experience shows that from the time funding is available to having actual charging stations operational runs 12-24 months. Thus, it is critical that this infrastructure investment be committed as soon as possible.

EVCA's members report the following best practices in structuring an EV charging infrastructure deployment program:

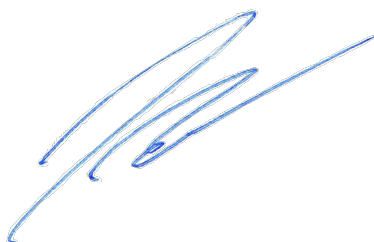
- Incentives should be structured through rebates, grants, and/or competitive programs;
- Promote public-private partnerships that support industry competition and allow a variety of business models to participate in the program;
- Support charging wherever drivers need to charge, including multifamily residential, workplace, and;
- Support the Air Resources Board's recommendation that at least 35 percent of this allocation benefit disadvantaged or low-income communities.

#### *Non-EVSE Appendix D Funding*

For the remaining 85% of Environmental Mitigation Trust funding available, **EVCA strongly supports staff's proposed allocations for zero-emission buses and trucks, and appreciate staff's inclusion of EV charging infrastructure as eligible for funding in these categories.**

Thank you for considering our recommendations. As you work toward finalizing the Beneficiary Mitigation Plan, please consider EVCA as a resource for insight into both the EV charging industry and the broader EV industry. We offer a continuing partnership to usher in an era of transportation innovation in California.

Sincerely,

A handwritten signature in blue ink, consisting of several fluid, overlapping strokes that form a stylized, cursive-like shape.

Jim Ross  
Director, EVCA  
[jim@telegraphpr.com](mailto:jim@telegraphpr.com)  
P: (415) 824-0582