CLEAN FUEL CONNECTION, INC.

April 10, 2017

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

Dear Chairperson Nichols,

Clean Fuel Connection, Inc. has been selling and installing electric vehicle charging equipment since 1999. We distribute products from many EVSE manufacturers including ChargePoint, We therefore read with great interest VW's California ZEV Investment Plan: Cycle 1.

We believe that VW's initial plan represents a reasonable initial effort attempt to outline its plans for Electrify America under Cycle 1, but it also reflects VW's lack of experience in the EV charging industry. The success of the EV charging industry to date has been a result of a team effort among many small companies--competitors as well has collaborators—all with the same goal of getting more electric vehicles on the road. None of us has succeeded by going it alone. We hope that VW will take the same approach and engage with the current product manufacturers and installers rather than "reinventing the wheel" but we only time will tell if VW will choose that path or "go it alone."

Given the estimated need for charging infrastructure, VW's investment represents only about 10% of the total required investment. However, the initial $200 million from Electrify America could be used to extend and multiply current efforts in a coordinated manner or it could result in competing DC fast charging stations across from each other in high demand areas while low income communities remain under served because there is no near term business case for the investment. In addition deployment will occur much more quickly if VW works with existing equipment vendors and installers, several of whom have a substantial market share. We hope that the California Air Resources Board will hold VW to its word on its commitment to collaborate with utilities and industry players in addition to government entities.

As the successor to the first CA EV charging business, CFCI hasseen many market participants come—and go. All of us, including VW, face the same obstacles to infrastructure including drawn out host site negotiations, variable local permitting requirements and lengthy utility interconnection time frames. Other critical issues include 1) utility rate demand charges which are a disincentive to fast charging and 2) accessibility requirements that are difficult to interpret and costly to implement. Our hope is that as

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a large corporate player bringing substantial resources to the market, VW will join with us to help us find solutions to these problems.

The other major flaw in VW's plan is its lack of specificity on low income communities. The proposed plan actually insults these communities by saying the chargers off the freeways in these communities will serve the communities as well. The pollution from those same freeways is what is causing the health impacts to these communities. The plan should discuss actually engagement with the low income communities, not a drive by solution that enables drivers to fill up quickly and get out of the low income area as quickly as possible. We hope that ARB will ask VW to provide more emphasis on low income areas in Cycle 2.

In conclusion, while we think VW's Cycle 1 plan is far from perfect, it is a start and we encourage CARB's approval of the plan, but with some of the caveats discussed above. Let's give VW a year to prove their good intentions and address any shortcomings in the following years.

Submitted by:

Enid Joffe

Enid Joffe, President