



11390 W. Olympic Blvd, Suite 250
Los Angeles, CA 90064

November 18, 2019

California Air Resources Board
1001 I St.
Sacramento, CA 95814

Re: Proposed Amendments to the Low Carbon Fuel Standard Regulation

Dear Board Members and Staff:

EVgo appreciates the opportunity to provide feedback on the California Air Resources Board (CARB) Proposed Amendments to the Low Carbon Fuel Standard (LCFS) Regulation. As the nation's largest public fast charging network, EVgo has worked with CARB, the California Energy Commission, the California Public Utilities Commission (CPUC), and others in the public and private sector to build charging stations across California. Today, more than 80% of the population of California lives within a 15 minute drive of one of EVgo's more than 300 fast charging stations in the state, and EVgo's network in California has increased by 40% since year-end 2018.

EVgo thanks CARB for its work on the LCFS, which has been a transformative policy tool for accelerating transportation electrification. Notably, LCFS has been critical for maintaining lower electricity costs to California EV drivers by helping to cover a portion of operating expenses including, in the case of EVgo, a 24-hour call center, operations and maintenance which has led to a 98% uptime across the EVgo network, energy costs, and other related expenses.

As CARB discusses new amendments to LCFS, EVgo respectfully suggests the following as it relates to eligible projects for holdback credits.

I. EVgo supports directing holdback credit proceeds toward vehicle deployments.

The LCFS amendments as drafted could be critical for increasing vehicle deployments in low income communities, whether for personal use, public transportation, or other electric mobility solutions such as rideshare, where drivers, often low and moderate income members of the gig economy, drive three to seven times that of personal use drivers. Moreover, a study from the Rocky Mountain Institute showed that rideshare drivers could save \$5,200 per year by driving an electric car instead of a gas-powered vehicle.¹ EVgo strongly supports CARB's amendments to include these vehicle deployments as eligible candidates for holdback credit proceeds, and EVgo recommends that utilities prioritize funding projects in these categories.

Today, California is 4.3 million vehicles short of reaching its goal of 5 million EVs on the road by 2030. Given budget constraints under the Clean Vehicle Rebate Project (CVRP), limited rebate funding available for light duty fleet drivers from other California programs, and declining federal tax credits, holdback credit proceeds could be an important funding source for increasing vehicle deployments and helping California to meet its ZEV goals.

¹ <https://rmi.org/ride-hailing-drivers-ideal-candidates-electric-vehicles/>

II. **CARB should require for charging infrastructure investments to be combined, or at least coordinated, with existing state programs.**

While EVgo prefers for funding to be directed to vehicle deployments, we would respectfully request that if holdback credit proceeds are directed to infrastructure programs that the proceeds be used to supplement existing infrastructure programs. Developing new programs could significantly delay deployments, and from an operator's perspective, differing state and utility programs often come with inconsistencies as it relates to technical requirements and program design.

For example, rather than creating a new infrastructure program, proceeds could be directed to existing state programs such as CARB's Clean Mobility Voucher Project, which focuses on mobility projects in disadvantaged communities, or CALeVIP, which is administered by the California Energy Commission and aims to guide California toward its goals of 10,000 DCFC by 2025 and 250,000 Level 2 chargers. Additionally, CALeVIP has an explicit goal for investments in disadvantaged communities, and all infrastructure funding from holdback credits could be directed to charging stations in these communities. Leveraging investments into these existing programs will help the market move faster, further accelerating transportation electrification in the state.

Conclusion

EVgo thanks the CARB board and staff for the opportunity to provide input on this important rulemaking. Please do not hesitate to be in contact if we can answer any questions or be a resource.

Sincerely,



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