GENERAL MOTORS

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January 8, 2018

Texas Commission on Environmental Quality
Air Quality Division
Implementation Grants Section, MC-204
P.O. Box 13087
Austin, TX 78711-3087

Subject: GM Comments on Developing a Beneficiary Mitigation Plan for Texas' Allocation of the Volkswagen Environmental Mitigation Trust

General Motors LLC (GM) appreciates the opportunity to provide input on the use of funding in the state's Beneficiary Mitigation Plan for the VW Environmental Mitigation Trust and would like to encourage Texas to use the maximum allowed 15% of the fund (equating to over $31 million) to increase the availability of critically-needed electric vehicle (EV) charging stations. There are currently over 21,000 EVs registered in Texas, and in order to grow the EV market and attract even more advanced transportation technologies to the state, such as self-driving EVs, Texas needs to invest in a charging infrastructure network that addresses consumer and industry concerns.

Automakers have made enormous investments in the electrification of transportation – GM alone has invested billions of dollars to develop electrification technologies, including the state-of-the-art Chevrolet Volt and Chevrolet Bolt EV, which has swept the industry's most prestigious car awards, including North America Car of the Year, Motor Trend's® 2017 Car of the Year, MotorWeek's 2017 Drivers' Choice "Best of the Year" Award, and Green Car Journal's Green Car of the Year. The Bolt EV is the industry's first affordable, long-range EV with an EPA estimated range of 238 miles-per-charge, and is now available at Chevrolet dealers across all 50 states, including Texas. This advanced technology will require more widespread charging infrastructure to convince consumers that EVs can be driven anywhere they need to go. Thus the urgency to rapidly expand EV charging infrastructure across Texas.

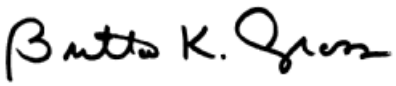
While the majority of all EV charging today is done at the home, there are still critical infrastructure needs not met by single-family home charging. And to maximize the impact of limited state funds, it is important to invest strategically. GM would prioritize today's key infrastructure needs as follows:

1. **Highway corridor DC fast-charging** most visibly inspires consumer confidence in the driving range, and practicality, of EVs. A 2016 survey of 2,500 consumers by Altman Vilandrie & Company found the top reason customers gave for not wanting to purchase a plug-in electric vehicle was a perceived lack of charging stations (85%). Highly visible corridor EV charging (SAE industry standard) on key, high-volume routes can help address this consumer perception issue.
2. **Workplace EV charging** creates an EV "showroom" that very effectively grows EV awareness among corporations, and employees of these corporations. According to US DOE data, workplace charging results in employees 6X more likely to purchase an EV than employees at companies not offering workplace charging.
3. **Multi-unit dwelling EV charging** provides an important opportunity to expand EV adoption to consumers residing in townhomes, condominiums, and apartments, who may not have access to a "home" charger every evening. This is currently an untapped segment of potential EV buyers. This need can be met by Level 1 or Level 2 charging directly at the multi-unit dwellings, or by neighborhood DC fast-charge hubs that can serve these residents.
4. **Public EV charging at key destinations** is also important to increase the practicality of EVs and the number of places an EV can go, with a special focus on destinations typically outside a consumer's normal daily driving patterns (e.g. airports, hotels, resorts, etc.).

EV charging infrastructure is vital to the growth of the EV market and will lead to long-lasting emissions reductions that increase over time as the market expands. And Texas' low electricity prices mean that electric vehicles are an important economic driver for the state. Finally, we encourage Texas to directly engage all electric utilities in the strategic planning of EV infrastructure to ensure the most cost-effective and grid-responsible EV charging solutions. Utilities can also play an important role in outreach and education to support the transformational change that is required to electrify transportation.

The VW Environmental Mitigation Trust is an opportunity to invest in forward-looking infrastructure that lays a much-needed foundation for EV market growth and will help attract even more advanced transportation technologies to Texas. GM greatly appreciates Texas' commitment to support the strategic transition to transportation electrification and all efforts to help drive this emerging market.

Sincerely,



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