

**Electric Vehicle Charging Association**

455 Capitol Mall, Suite 600  
Sacramento, CA 95814

January 12, 2018

Texas Commission on Environmental Quality  
VW Settlement Funds  
P.O. Box 13087  
Austin, TX 78711-3087

**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 Texas under Appendix D of the VW Settlement. The Electric Vehicle Charging Association (EVCA) sees this as unique opportunity for Texas to make a major investment in clean transportation, attracting private investment and improving air quality and public health.

EVCA is a not-for-profit trade organization of eight 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 Texas.**

*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. Texas now has 54.41 EVs on the road per level 2 charger installed and 31.56 vehicles per DC charger installed. **EVCA recommends that Texas commit its full 15% allowance toward EVSE.**

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

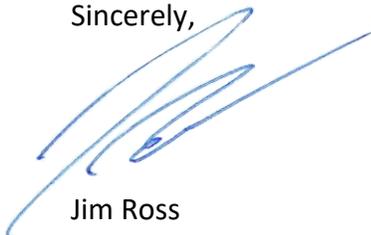
- Incentives should be structured through rebates, grants, and/or competitive programs;
- Promote public-private partnerships that support industry competition and allow a variety of business models to participate in the program;
- And seek a balanced approach between the various dwell-time use cases for EV charging, such as highway or urban DC-Fast Charging, and residential and public Level 2 charging infrastructure.

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

For the remaining 85% of Environmental Mitigation Trust funding available, **EVCA encourages Texas to prioritize electrification over other alternative fuel sources**, as it will provide the greatest relief for transportation greenhouse gas (GHG) emissions. Focusing on transitioning public transit (i.e. buses, medium duty transit vehicles) into an electric fleet will yield major reductions in GHG emissions. Possible projects include regional, municipal and school bus fleets. Markets have spoken and electrification has been the choice. As battery costs decline, there will be continued benefits from choosing the path of electrification for state residents and businesses.

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 Texas.

Sincerely,



Jim Ross  
Director, EVCA

████████████████████  
P: (415) 824-0582