

# GENERAL MOTORS

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**Subject: GM Comments Relative to the Draft Beneficiary Mitigation Plan for Texas**

General Motors LLC (GM) appreciates the opportunity to provide input on the Draft Beneficiary Mitigation Plan for Texas. GM is very supportive of the proposed plan and commends the Texas Commission on Environmental Quality (TCEQ) for allocating 15% of the fund (equating to approximately \$31mil) to increase the availability of critically-needed electric vehicle (EV) charging stations that will be required to attract EVs and even more advanced transportation technologies to the state.

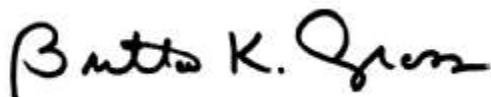
GM supports the proposed plan to “consider installation of electric charging infrastructure at public areas, workplaces, and multi-unit residences, as well as ... along key transportation corridors” and agrees in the importance of using the TCEQ funding “to complement and not compete with the efforts of Electrify America.” The plan further describes a grant process that will consider applications “under either a first-come, first-served process or a competitive-selection process.” In order to assess the value of proposed projects and fully maximize this investment opportunity, GM would encourage the TCEQ to directly engage key stakeholders (including Electrify America) in the development of a state-wide vision and plan for EV charging infrastructure. Key stakeholders beyond Electrify America, include automakers and the state’s electric utilities. We also suggest engaging stakeholders in neighboring states to help ensure the resulting EV charging infrastructure is as effective and visible to consumers as possible across the region. It’s important to recognize that the quality of infrastructure placement is generally more important than the quantity of EV stations deployed. This means it is key to establish an overall vision and strategy for the placement of EV charging infrastructure, based on sound expert stakeholder input, that will result in an overall compelling “story” that will change consumers’ perceptions and convince them that EV charging infrastructure is everywhere it needs to be.

As a reminder of our previous comments: 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:

- I. **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) can help address this consumer perception issue.
- II. **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.
- III. **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.
- IV. **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, beaches, hotels, resorts, etc.).
- V. **Urban core DC fast-charging** is critical to attracting and supporting high-mileage commercial mobility solutions such as car-sharing and ride-hailing used for the movement of both people and goods.

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 appreciates the TCEQ's efforts to support the strategic transition to transportation electrification and we are available at any time to answer any additional questions the Commission may have.

Sincerely,



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