



December 19, 2017

Brett Rude  
Department of Ecology, Air Quality Program  
P.O. Box 47600  
Olympia, WA 98504-7600

**RE: Introduction of EV Connect and  
Comments on VW Settlement Appendix D Environmental Mitigation Trust**

EV Connect thanks you for this opportunity to provide comments on the Environmental Mitigation Trust funding allocated to the State of Washington under Appendix D of the VW Settlement. We commend the State of Washington in taking the opportunity to make a major investment in the public health of its residents by investing in clean transportation and improving overall air quality. EV Connect believes that by taking advantage of the full 15% of eligible funding to develop EV (Electric Vehicle) infrastructure will garnish the largest emissions reduction benefit the State of Washington. However, it is crucial for the State of Washington to make prudent decisions on the type of EV infrastructure that it invests in.

EV Connect is a leading provider of **open, standards-based** electric vehicle (EV) charging solutions for commercial, enterprise, hospitality, university and government facilities. EV Connect developed and operates the industry's most robust, open, and flexible cloud-based platform for the management of the entire EV ecosystem -- charging stations, the drivers that use them, the hosts that own them and the electric utilities that feed them. The EV Connect platform provides **charge station agnostic** command & control; enterprise and energy systems integration via an open API; driver communications and support; and demand-response functionality across multiple charging stations and networks. This approach maximizes investment dollars into a variety of EV charging solutions by preventing host sites within the State of Washington from being locked into a proprietary network and hardware relationship.

EV Connect's focus on providing a Software-as-a-Service (SaaS) solution to the EV charging industry enables it to manage across multiple charging station networks; provide integration between disparate charging station hardware; and increase feature/functionality to the charging eco-system.

The market has seen over 650,000 new EVs hit the road in the United States, since 2010—and growing. Every major automaker has announced substantial investments in electrification of light duty vehicles, with over 20 EV models already available. Transit and medium duty vehicle products are now competitive with combustion engine counterparts and major fleets across the country have announced plans for full electrification. EV Connect currently manages over 2,500 EV charging stations and is prepared to work in collaboration with the State of Washington offering the ability



to provide a range of partnerships from simple charging management solutions to full turn-key development abilities.

EV Connect makes the following recommendations needed to **necessitate a robust EV charging infrastructure for the State of Washington:**

*Light Duty EV Supply Equipment (EVSE)*

- EV Connect recommends that the State of Washington commit its full 15% allowance towards the implementation of an open, robust charging infrastructure throughout the State.
- Incentives should be structured through competitive programs;
- Insist upon an open, standards-based platform, as opposed to a proprietary, closed system where participants are restricted to one vendor/manufacturer;
- Promote public-private partnerships that support industry competition and allow a variety of business models to participate in the program;
- Seek a balanced approach between highway (DC Fast Charging) and residential/workplace and public (Level 2) charging infrastructure;
- Encourage cooperation with the local electric utility

All of these will encourage the adoption of environmentally-friendly electric vehicles; contribute to an efficient EV ecosystem within your state, and provide your citizens with reliable fueling capabilities.

*Non-EVSE Appendix D Funding*

EV Connect has experience providing charging infrastructure within the medium and heavy-duty sector including both fleet and transit and therefore believe that a large portion of the remaining 85% of Environmental Mitigation Trust funding available to your state can be fulfilled with EVs. As the largest emitters, the greatest relief in transportation emissions can be gained by through the electrification of the fleet and truck sectors. **EV Connect encourages the State of Washington to prioritize electrification over other alternative fuel sources.** EV Connect has already begun working in many U.S. cities on possible projects include regional, municipal and school bus fleets.

We hope you have found this letter informative, and thank you for considering our recommendations. As you work toward finalizing the Beneficiary Mitigation Plan, please consider EV Connect not only as an experienced, well-qualified supplier for your EV charging infrastructure needs, but also as a resource for insight into both the EV charging industry and the broader EV industry. We welcome a continuing partnership to usher in an era of transportation innovation in the State of Washington.

Sincerely,

A handwritten signature in black ink, appearing to read "Jordan Ramer".

Jordan Ramer, CEO

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