



Comments of EVgo Services, LLC
Volkswagen Settlement Proposed Beneficiary Mitigation Plan
Washington Department of Ecology
Submitted December 19, 2017

Thank you for the opportunity to comment on Washington Department of Ecology's Volkswagen Environmental Mitigation Plan development. As a charging infrastructure leader—with the largest public fast charging network in the country and an existing network in the state—EVgo continues to believe that any and all additional funding for fast charging infrastructure is welcome and vital to help make electric vehicle (EV) adoption more accessible for Washington residents.

Transportation electrification necessitates a robust charging infrastructure to unlock its benefits for the state of Washington. Below are EVgo's comments and recommendations for the Environmental Mitigation Plan:

Light Duty EV Supply Equipment (EVSE)

EVgo recommends the max 15% utilization of total settlement funds allotted to light duty EV Supply equipment. EVgo believes that ZEV charging infrastructure investments are critical to bringing needed ZEV driving capabilities to communities across the state. This settlement provides the opportunity for a large injection of additional capital into ZEV infrastructure, and EVgo views this as necessary and beneficial for Washington drivers, EV deployments, and existing charging industry participants. Accordingly, we have been supportive of the infrastructure investments planned under the VW 2.0 liter settlement, as we have of the investments of any automaker looking to tackle EV infrastructure.

EVgo continuously sets industry best practices and recommends the following elements to Washington's light duty 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 highway (DC-Fast Charging) and residential (Level 2) charging infrastructure.

Non-EVSE Appendix D Funding

EVgo recommends Washington to prioritize electrification over other alternative fuel sources for the remaining 85% of the trust funding available. Electrification achieves the greatest influence on transportation greenhouse gas (GHG) emissions. The electrification of public transit (e.g. buses, medium duty transit vehicles) has the potential to yield major additional reductions in GHG emissions. As we see the market pivoting towards this transition, there are many additional co-benefits to add. Many jurisdictions are now committing to 100% ZEV buses, so there will be purchasing groups that reduce

costs. The electric fleets are also significantly quieter than diesel, which is an important urban quality of life issue. As battery costs decline, there will be continued benefits from choosing the path of electrification for state residents and businesses.

Administration of Funds

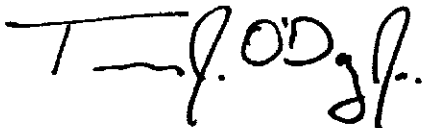
EVgo supports the administration of funding and projects through existing Washington programs to ensure a streamlined process and effective timeline. Our longstanding industry experience shows that the complete charging installation process from time of funding to fully operational station can run from 12-24 months. Thus, the importance of Washington to begin the processes as soon as possible could not be more important.

Geography of Project Allocations

Through Appendix C settlement funds, VW, through its Electrify America efforts, will be building highway charging corridors across the United States. **Therefore, EVgo recommends focusing the Appendix D Environmental Mitigation Trust funding on intra-urban charging stations for multifamily communities.** Publicly accessible urban charging stations helps alleviate the barrier of owning an electric vehicle when home charging is not an option.

Thank you for considering our comments and recommendations. As you work toward finalizing the Beneficiary Mitigation Plan, please consider EVgo as a resource for insight into both the EV charging industry and the broader EV industry. We offer ourselves as continuing partners in an effort to usher in a new era of transportation innovation in Washington.

Best Regards,



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