

January 13, 2017

Via Email & Electrify America Website

Mark McNabb, Chief Operating Officer  
Volkswagen Group of America  
2200 Ferdinand Porsche Drive  
Herndon, VA 20171  
Email: mark.mcnabb@vw.com

Re: The ZEV Investment Plan (Appendix C of the Volkswagen Settlement Consent Decree)

Dear Mr. McNabb,

The Connecticut Electric Vehicle Coalition is a coalition of advocates<sup>1</sup> that support incentives and other policies that will put more EVs on the road in Connecticut and achieve significant economic, public health, and climate benefits for our state. Nearly 40 percent of Connecticut's greenhouse gas (GHG) emissions come from the transportation sector.<sup>2</sup> To reach Connecticut's emissions-reduction goals and transition to a clean energy future, it is critical that Connecticut reduces our reliance on gasoline-powered vehicles and turns to cleaner transportation. Better charging infrastructure is necessary to meet the needs of current drivers of electric vehicles, and to encourage potential consumers to choose zero emission vehicles (ZEVs) by decreasing range anxiety.

The Connecticut EV Coalition believes the Volkswagen (VW) settlement team can make an important difference in proliferating EV use in Connecticut through the National ZEV Investment Plan. We are writing to encourage VW to facilitate investment in brand-neutral EV charging infrastructure along Connecticut's interstate highways—a critical stretch of the Northeast Corridor—and to incentivize the installation of charging infrastructure in Connecticut's metro areas, including New Haven, Hartford, Bridgeport and Stamford.

First, with respect to charging infrastructure along interstate highways, the EV Coalition agrees with NESCAUM that investments in transportation electrification in the Northeast Corridor are critical to promoting transportation electrification nation-wide, would be a cost-effective way to drive EV adoption, and would be consistent with the terms of the VW consent decree.<sup>3</sup> According to Connecticut's Department of Energy and Environmental Protection (DEEP), there are at least 282 public EV charging stations in Connecticut. But there are many stretches of highway that are underserved, especially with respect to the low number of high speed direct

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<sup>1</sup> The founding EV Coalition members that are currently part of the EV Coalition Steering Committee include: Acadia Center, Connecticut Fund for the Environment, Environment Connecticut, and the Sierra Club. For a full list of EV Coalition members and additional information about the Coalition, please access our webpage at: <http://www.ctenvironment.org/ct-electric-vehicle-coalition>.

<sup>2</sup> Connecticut Green Bank, Moving Forward with Green Energy, September 2016, available at <http://www.ctgreenbank.com/wp-content/uploads/2016/09/CTGreenBank-Market-Potential-Assessment-Alternative-Fuel-Vehicles-090816-FF.pdf>.

<sup>3</sup> NESCAUM letter to Mark McNabb, COO of VW, dated December 9, 2016, available at <http://www.nescaum.org/topics/zero-emission-vehicles/>.

current (“DC”) fast chargers between New Haven and Hartford on Interstate-91, and between New Haven and New London on Interstate-95.<sup>4</sup> The EV Coalition strongly supports incentivizing the installation of DC Fast chargers and dual level chargers at all highway rest stops along Connecticut’s critical interstate highways, including Interstates 91, 95, 84, and 395.<sup>5</sup>

Second, we also support NESCAUM’s proposal to establish guiding principles for VW’s ZEV investments in the Northeast Corridor states. As noted by NESCAUM, identifying such principles can help shift from the focus of ZEV investments from “quick wins” to providing “a solid foundation for the strategic long-term build out of ZEV infrastructure in the region that will foster a sustainable ZEV market.”<sup>6</sup> Efforts to establish comprehensive guiding principles are underway in California at the California Air Resources Board, which could serve as a model for a process in the Northeast.

Third, the Connecticut EV Coalition also urges VW to prioritize ZEV Investment fund money for publicly available charging stations in urban areas, particularly in parking facilities serving multi-unit dwellings and workplaces.<sup>7</sup> Cities represent a significant percentage of potential U.S. auto sales due to their high populations, and as centers of businesses and workplaces. Increasing electric vehicle charging infrastructure and focusing electric vehicle promotion activities in Connecticut’s cities are therefore cost-effective strategies to encourage widespread EV proliferation.<sup>8</sup>

Finally, the Connecticut EV Coalition urges VW to institute a broad-based communications and public outreach campaign to increase consumer awareness and demand for ZEVs. As the settlement recognizes, active education efforts will create a more informed public that will better understand the technology involved, and the many benefits of ZEVs. The Public Outreach campaign should include brand-neutral TV advertisements, web-based resources, social media, and public service announcements with testimonials from ZEV owners and lifetime vehicle cost calculations. The public outreach campaign should also include opportunities for potential customers to drive ZEVs with “ride ‘n drive” events. Moreover, education and outreach should be directed to low-income populations, particularly regarding the long-term cost-saving benefits

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<sup>4</sup> DEEP, Connecticut’s Existing EV Charging Equipment, November 2016, available at [http://www.ct.gov/deep/lib/deep/air/electric\\_vehicle/ev\\_charging\\_stations\\_in\\_ct.pdf](http://www.ct.gov/deep/lib/deep/air/electric_vehicle/ev_charging_stations_in_ct.pdf).

<sup>5</sup> Importantly, the U.S. Department of Transportation designated portions of I-95, I-91 I-395 and I-84 running through Connecticut as “alternate-fuel” corridors in November 2016. *See* <http://www.georgetownclimate.org/articles/transportation-and-climate-initiative-states-receive-electric-vehicle-corridor-designation.html>.

<sup>6</sup> NESCAUM letter to VW dated December 9, 2016, p.3, available at <http://www.nescaum.org/topics/zero-emission-vehicles/>.

<sup>7</sup> C.C. Song, *Electric Vehicles; Who’s Left Stranded?*, The Greenlining Institute at 4 (August, 2011), available at <http://greenlining.org/wp-content/uploads/2013/02/ElectricVehiclesReport.pdf>.

<sup>8</sup> International Council of Clean Transportation, White Paper on Assessment of Leading Electric Vehicle Promotion Activities in United States Cities, July 2015, available at [http://www.theicct.org/sites/default/files/publications/ICCT\\_EV-promotion-US-cities\\_20150729.pdf](http://www.theicct.org/sites/default/files/publications/ICCT_EV-promotion-US-cities_20150729.pdf) (noting the top electric-vehicle adoption cities tended to have some combination of more electric vehicle promotion action, greater charging infrastructure per capita, greater consumer incentives, and greater model availability.)

of EVs and available rebates, to help bring the benefits of cleaner, lower-cost transportation to more households, as well as accelerate the transition away from fossil fuels.<sup>9</sup>

The Connecticut EV Coalition looks forward to future opportunities for collaboration with VW, relevant state agencies, NESCAUM, and other key partners who will be working develop a strategic plan for ZEV investments in Connecticut and the Northeast.

Sincerely,

The Connecticut Electric Vehicle Coalition

- Acadia Center
- Connecticut Automotive Retailers Association
- Connecticut Fund for the Environment
- ConnPIRG
- Conservation Law Foundation
- ChargePoint
- Clean Water Action
- Drive Electric Cars New England
- Energy Solutions, LLC
- Environment Connecticut
- Greater New Haven Clean Cities Coalition
- Hamden Land Conservation Trust
- People's Action for Clean Energy (PACE)
- Proton OnSite
- Plug In America
- RENEW Northeast
- Sierra Club
- Solar Connecticut, Inc.
- Tesla Motors
- Westport Electric Car Club

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<sup>9</sup> See The Greenlining Institute, Electric Vehicle for All: An Equity Toolkit, available at <http://greenlining.org/publications-resources/electric-vehicles-for-all/>. See also Portland Electric Vehicle Strategy – December 2016, available at <https://www.portlandoregon.gov/bps/article/619275>.

\* For additional information on this submission or on the Connecticut EV Coalition, please contact Claire Coleman, Climate & Energy Attorney at Connecticut Fund for the Environment at [ccoleman@ctenvironment.org](mailto:ccoleman@ctenvironment.org).