

August 2, 2013

Senator Ellen Corbett
State Capitol 313
Sacramento, CA 95814

Re: Senate Bill 454 (Corbett) – Support, if Amended

Dear Senator Corbett:

On behalf of the Los Angeles County Economic Development Corporation (LAEDC), an organization dedicated to promoting job growth, economic expansion and preserving the overall global competitiveness of Los Angeles County and the state of California, we are writing to express our conditional support for Senate Bill (SB) 454—a bill which sets forth standards for electric vehicle infrastructure that would pave the path for more widespread adoption.

Just in the past few years, we have learned a tremendous amount both in Los Angeles County as well as throughout the state and the nation on what it takes to make zero emission vehicles a readily-accessible option for consumers. Throughout this time, electric vehicle infrastructure has been deployed at a rate we have never seen and without a set of best practices/guidelines to really help guide its deployment. As such, we have some “lessons learned” and some mistakes that we must fix as electric vehicles and other alternative fuel vehicles become more commonplace.

We know, both from research and investments made, that the top concern consumers have regarding electric vehicles is fear that their vehicle will run out of charge before arriving at their destination—i.e., “range anxiety.” To assuage this concern, millions of dollars of investments have been made to deploy publicly available electric vehicle chargers. Unfortunately, however, not every public charger has been developed in the same way; many of these public chargers have restrictions on their use, requiring a user to have a membership with a charging company before they can utilize the station. This presents a barrier for use of these public stations as well as confusion among consumers. SB 454 aims to address some of this confusion by requiring that publicly accessible charging stations abandon their members-only rules and allow for a credit card to serve as an acceptable payment option.

In March 2012, Governor Brown issued an executive order directing the state government to help accelerate the market for zero-emission vehicles in California, which include plug-in electric vehicles. To accelerate this adoption, electric vehicle owners need to have the confidence that they will be able to locate charging stations and charge their vehicles using generally accepted and common payment methods. Once again, we believe SB 454 will address this challenge and improve the accessibility of publicly available charging stations by prohibiting the station companies from requiring a membership or subscription for use.

While we support the goals of SB 454 to promote widespread adoption of electric vehicles and ensure that existing public infrastructure investments can be utilized more effectively, we also need to have reliable rules. **This means, we cannot and should not change the rules on companies after investments have been made**, and that we must not impose costly mandates on companies after they have already invested in California. Thus, we make the following recommendation to apply this bill’s requirements prospectively and to include a grandfather clause that exempts companies that have already made investments in and sunk significant dollars into building and rolling out existing stations.



We believe that SB 454 is a low-cost solution but critically important step to ensure the growth of electric vehicles throughout California as well as the more effective use of public investments already made in electric vehicle charging stations. However, the bill's requirements should not be retroactively forced onto stations that have already risked capital and expended resources (without sufficient payment or incentives in place to make these changes). For all of these reasons, we offer our conditional support on SB 454 and encourage the adoption of the aforementioned recommendation.

Sincerely,

A handwritten signature in dark ink, appearing to read "D. Flaks", is positioned below the "Sincerely," text. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

David Flaks
Chief Operating Officer
LAEDC