

From: [Walsh, Brian](#)
To: [Regynski, Barb](#)
Cc: [Gustafson, Brian](#); [Walsh, Brian](#); [Duvall, Ron](#)
Subject: FW: [EXT] ATTEN: Barb Regynski
Date: Monday, June 11, 2018 9:07:05 AM
Attachments: [South Dakota - VW Draft Beneficiary Mitigation Plan - General Motors comments 11 June 2018.pdf](#)

Hi Barb – to your attention. Thanks!

NOTE: When replying to this email do **NOT** click the person's [\[mailto:myname@email.com\]](mailto:myname@email.com) address since this may result in your reply being undeliverable. Either copy and paste just the email address (e.g. myname@email.com) or type just the address into your reply message.

From: Britta K Gross [<mailto:britta.gross@gm.com>]
Sent: Monday, June 11, 2018 9:03 AM
To: DENR INTERNET INFORMATION
Subject: [EXT] ATTEN: Barb Regynski

GM Comments - Rhode Island Draft Beneficiary Mitigation Plan

Ms. Regynski:

Thank you for the opportunity to provide comments to the Draft BMP. GM is very supportive of all your efforts to drive the EV market – and we encourage South Dakota to commit to the full 15% of funding for EV charging infrastructure – particularly DC fast-charging (compliant with the SAE open industry standard).

It's especially important that South Dakota also develop a state-wide infrastructure strategy/plan that ensures the resulting EV charging infrastructure is as cost-effective and visible to consumers as possible. If GM can be of any help in this process, please don't hesitate to ask.

I appreciate any consideration of our comments attached.

Regards, Britta

Britta Gross

Director, GM Advanced Vehicle Commercialization Policy

586-596-0382

britta.gross@gm.com



GENERAL MOTORS

Nothing in this message is intended to constitute an electronic signature unless a specific statement to the contrary is included in this message.

Confidentiality Note: This message is intended only for the person or entity to which it is addressed. It may contain confidential and/or privileged material. Any review, transmission, dissemination or other use, or taking of any action in reliance upon this message by persons or entities other than the intended recipient is prohibited and may be unlawful. If you received this message in error, please contact the sender and delete it from your computer.

GENERAL MOTORS

Britta K. Gross Director
Advanced Vehicle Commercialization Policy
Environment, Energy & Safety Policy

General Motors Global Headquarters
MC: 482-C30-C76
300 Renaissance Center
Detroit, MI 48265-3000

11 June 2018

South Dakota Department of Environment and Natural Resources
DENRINTERNET@state.sd.us

Subject: GM Comments relative to the South Dakota Draft Beneficiary Mitigation Plan

Attention: Barb Regynski

General Motors LLC (GM) appreciates the opportunity to provide input on the proposed use of funding in the state's Draft Beneficiary Mitigation Plan and we would encourage South Dakota to allocate the maximum allowed 15% of the fund (equating to roughly \$1.2mil) to increase the availability of critically-needed electric vehicle (EV) charging stations that will drive a forward-looking technology and mobility strategy for the state. Such a vision will be required to attract EVs and even more advanced transportation technologies to the state, such as self-driving EVs in shared mobility applications, that are key to future mobility. There are over 300 EVs registered in South Dakota today, yet no (0) DC fast-charging stations in the state that meet the SAE open industry standard, and in order to grow the EV market and attract increasingly advanced mobility solutions, South Dakota should commit to developing a strategy for EV charging deployment across the state, and commit to a corresponding investment in this charging infrastructure network that will address consumer and industry concerns.

EV charging infrastructure today has not attracted sufficient investment to establish a compelling foundation of EV charging stations. This market will become more viable and competitive over time, but this early market currently requires additional investment to close the infrastructure gap and establish a network of charging stations that is highly visible to consumers and drives consumer-confidence in the ability to drive EVs anywhere in the state. According to NREL's National PEV Infrastructure Analysis* (September, 2017), South Dakota could be home to an estimated 21,000 plug-in EVs by 2030, requiring 40 DC fast-charging stations (open industry-standard), 800 workplace chargers, and 600 additional public Level 2 charge stations. This need requires an up-front strategy and firm investment plan to ensure that South Dakota is prepared for the mobility transformation. The ability to introduce and grow these advanced electric mobility services relies on a robust foundation of EV charging infrastructure, especially DC fast-charging.

We suggest that South Dakota develop a state-wide vision for EV charging infrastructure that ensures that the resulting EV charging infrastructure is as effective and visible to consumers as possible. 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.

Automakers have made enormous investments in the electrification of transportation – GM alone has invested billions of dollars to develop electrification technologies, including the state-of-the-art Chevrolet Volt and Chevrolet Bolt EV, which has swept the industry's most prestigious car awards, including North America Car of the Year, Motor Trend's® 2017 Car of the Year, MotorWeek's 2017 Drivers' Choice "Best of the Year" Award, and Green Car Journal's Green Car of the Year. The Bolt EV is the industry's first affordable, long-range EV with an EPA estimated range of 238 miles-per-charge, and is available now at Chevrolet dealers across South Dakota. This advanced technology will require more widespread charging infrastructure to convince consumers that EVs can be driven anywhere they need to go. Thus, the urgency to rapidly expand EV charging infrastructure in South Dakota.

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:

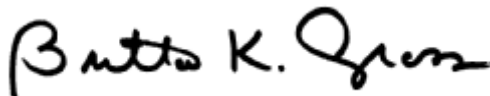
1. **Highway corridor DC fast-charging** most visibly inspires consumer confidence in the driving range, and practicality, of EVs. A 2016 survey of 2,500 consumers by Altman Vilandrie & Company found the top reason customers gave for not wanting to purchase a plug-in electric vehicle was a perceived lack of charging stations (85%). Highly visible corridor EV charging (SAE industry standard) can help address this consumer perception issue.
2. **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.
3. **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.
4. **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.).

EV charging infrastructure is vital to the growth of the EV market and will lead to long-lasting

emissions reductions that increase over time as the market expands. In addition, as electricity prices in South Dakota are very low relative to gasoline and are also extremely stable, electricity provides a very compelling business case for both consumers and fleet operators. And these fuel savings will translate into consumer spending on other local goods and services, which means that electric vehicles are an important economic driver for South Dakota. Note also, that South Dakota can significantly increase the impact of infrastructure investments by directly engaging electric utilities in the strategic planning of EV infrastructure to ensure the most cost-effective and grid-responsible EV charging solutions.

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 South Dakota. GM greatly appreciates South Dakota's commitment to support the strategic transition to transportation electrification and all efforts to help drive this emerging market.

Sincerely,

A handwritten signature in black ink that reads "Britta K. Gross". The signature is written in a cursive, flowing style.

Britta K. Gross, Director
Advanced Vehicle Commercialization Policy
britta.gross@gm.com
(586) 596-0382

* NREL National PEV Infrastructure Analysis (Sept 2017) -- <https://www.nrel.gov/docs/fy17osti/69031.pdf>