



April 18, 2016

Honorable Liane Randolph
Commissioner
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: R. 12-12-011, Revise Proposed Ridesharing Decision to Promote Clean Vehicle Use

Dear Commissioner Randolph,

We urge your revision of the Phase II Ridesharing Proposed Decision to allow TNC drivers to use vehicles obtained through rentals or short-term leases. The current proposal requires that TNC drivers own or lease their vehicles for terms longer than four months, the consequence of which would be to remove hundreds of TNC electric vehicles currently in service and eliminate a promising strategy for increasing electric vehicle (EV) deployment, especially in disadvantaged communities.

Accelerating adoption of zero-emission vehicles in California is of critical importance to realizing California's climate protection and clean air goals. The high growth rate of TNCs presents an opportunity to rapidly advance vehicle electrification at little or no cost to taxpayers.

Short-term rentals represent a promising way to get EVs onto TNC platforms, where their use can substantially reduce criteria air pollutants and greenhouse gas emissions. To realize this potential, a fleet of affordable, maintained EVs must be available to TNC drivers.

Requiring drivers to purchase or enter long-term leases for EVs in order to drive for TNCs will block this progress. Even with recently expanded state EV purchase rebates, many drivers cannot afford EVs. Short-term rentals overcome this by making EVs available for low hourly rates. Additionally, through these rental arrangements, all charging and maintenance needs are taken care of, eliminating another barrier to more widespread adoption of EVs.

The proposed decision would end successful pilots like Los Angeles-based Evercar, which operates an innovative shared-EV model, offering individuals seeking ridesharing income an opportunity to use an EV for a low hourly rate. Evercar provides over 200 professionally

managed Nissan Leaf EVs to TNC drivers for as little as \$5 per hour, and is growing quickly thanks to strong driver demand. Other companies are providing TNC drivers access to hybrid electric vehicles, as well.

As the clean energy economy expands it is important that both the technologies themselves and the economic opportunities be available to all communities. Many low-income Californians would like to drive for a TNC platform, but do not own a qualifying vehicle. These individuals may not be able to purchase or enter into a long-term lease for an EV, but could have access to EVs through short-term rentals at affordable rates. The air quality and public health benefits of clean vehicles ought to extend to all.

For these reasons, we request that you revise the proposed decision to allow TNC drivers to use vehicles obtained through rentals or short-term leases. Thank you for your consideration of these comments.

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