



January 13, 2023

The Honorable Gretchen Whitmer  
Governor, State of Michigan  
P.O. Box 30013  
Lansing, MI 48909

Re: Allocating EV and charging incentives in the 2023-24 budget is critical to realizing the goals of the MI Healthy Climate Plan

Dear Governor Whitmer,

We, the undersigned businesses, represent the rapidly growing EV charging industry that is eager to do business in Michigan and support the state achieving its EV and charging deployment goals. Collectively, we manufacture, install, operate, and repair EV charging station software, hardware and other services. We write to respectfully urge you to allocate \$200 million in your executive budget for both EV and charger incentives to fulfill the promise of the state's MI Healthy Climate Plan (Plan). The Plan has set ambitious but achievable EV adoption and charger deployment targets, taking a critical multifaceted approach to addressing a multitude of vehicle use cases.

According to the Plan, the state has a goal to achieve 50 percent light-duty EV sales<sup>1</sup> and deploy enough charging infrastructure to support 2 million EVs by 2030<sup>2</sup> (approximately 100,000 chargers). By comparison, Michigan has only deployed 161,970 EVs to date<sup>3</sup> and has 1,059 charging station locations with a total of 2,450 charging ports available to the public<sup>4</sup>. Financial incentives will be critical to closing these gaps and keeping the state on track with its goals. These incentives can also yield additional benefits, including leveraging private investment, supporting job creation, and reducing pollution in environmental justice communities.

We encourage allocating the \$200 million as follows:

- \$55 million for public Level 2 and DC fast charger rebates. A public charger rebate program administered by the Department of Environment, Great Lakes, and Energy is a much needed complement to existing utility incentives and the Michigan's National EV Infrastructure (NEVI) Program funds. Michigan's NEVI funds are only deploying DC fast chargers along highway corridors, leaving significant gaps in needed public infrastructure deployment that are not being fully covered by utility investments. Furthermore, a rebate program is typically easier for the state to administer and easier for industry to access compared to other types of incentives because the paperwork to apply for an incentive is significantly less.
- \$50 million for battery EV and plug-in hybrid EV rebates, including new, used, and leased vehicles. The state cannot only incentivize infrastructure; it also needs to simultaneously incentivize vehicle purchasing and leasing, which will in turn drive more demand for infrastructure. This incentive program should bundle rebates with home charger and panel upgrade incentives. Lack of access to home charging can significantly deter consumer interest in EVs, and for low-income applicants especially, the cost alone to upgrade their home panel capacity can become a huge adoption barrier. Therefore, it's critical to create incentive "adders" for income qualified applicants to ensure those with the most need are accessing the greatest rebate level.
- \$25 million for state and municipal fleet electrification. This would enable the state to lead by example with its own EV adoption efforts and further support local governments and small businesses with transitioning their fleets<sup>5</sup>. Such incentives for fleet conversion should also include associated charging infrastructure procurement and installation costs to ensure their needs are being holistically addressed.

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<sup>1</sup> Department of Environment, Great Lakes, and Energy. MI Healthy Climate Plan. April 2022. Page 39.

<sup>2</sup> Department of Environment, Great Lakes, and Energy. MI Healthy Climate Plan. April 2022. Page 37.

<sup>3</sup> Alliance for Automotive Innovation. Electric Vehicle Sales Dashboard. Accessed December 27, 2022. <[electric-vehicle-sales-dashboard \(autosinnovate.org\)](https://www.autosinnovate.org/electric-vehicle-sales-dashboard)>.

<sup>4</sup> U.S. Department of Energy. Alternative Fuels Data Center. Accessed December 27, 2022. <[Alternative Fuels Data Center: Alternative Fueling Station Locator \(energy.gov\)](https://afdc.energy.gov/)>.

<sup>5</sup> Department of Environment, Great Lakes, and Energy. MI Healthy Climate Plan. April 2022. Page 39.

- \$70 million for medium- and heavy-duty EV and associated charging infrastructure rebates, including public transit buses, school buses, and other vehicles used for freight. This will greatly accelerate the state toward achieving 100 zero-emission bus sales and 30 percent medium- and heavy-duty EV sales by 2030, per the Plan<sup>6</sup>.

Under your administration, the state has deeply embraced the promise and potential of EVs, maintaining its innovative spirit in keeping with its automotive heritage. We are excited to further our partnership with you to achieve the state's long-term goals and stand ready to work with you to keep this industry growing.

Thank you for your consideration,

Cory Bullis  
Public Affairs Director  
FLO EV Charging

Matthew Bloom  
Director of Partnerships  
AmpUp

Emily Kelly  
Manager, Public Policy  
ChargePoint

Joshua Aviv  
Founder & CEO  
SparkCharge

Adam Mohabbat  
Policy Director, North America  
Wallbox

Brian Ross  
Senior Manager, Policy & Projects  
BP Pulse Fleet

Senator Bob Huff (ret.)  
Director of Government Affairs  
Noodoe

Matt Chen  
Director of Government Affairs  
Blink Charging & SemaConnect

Mike Smith  
Head of Product Deployment & Policy  
Xeal Energy

Nathan Bowen  
President  
DC-America

Mona Tierney-Lloyd  
Head, U. S. State Policy  
Enel North America, Inc.

Anthony Harrison  
Head of Regulatory and Government Affairs  
TeraWatt

William W. Kregel  
Vice President, Government Affairs  
BorgWarner Inc.

Ilya Marin  
CEO  
Epic Charging Inc.

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<sup>6</sup> Id.

Samantha Ortega  
Government Affairs Manager  
ChargerHelp!

Hannah Steinweg  
Public Policy Lead, Energy & Charging  
Rivian

Mark LaNeve  
President  
Charge Enterprises

Erica Dahl  
Head of Policy  
ChargeNet Stations

Paul Terry  
Senior Vice President  
EV Connect

Olivia Campbell Andersen  
Policy & Market Development, Eastern U.S.  
ABB E-mobility

Peter Olmstead  
Director of Public Policy  
FreeWire Technologies

Jacqueline Piero  
Head of Policy & Regulatory  
The Mobility House

Chris Vargas  
Senior Vice President, Government Affairs  
Chargie

Jarrett Stoltzfus  
Senior Director, Government Relations and Public Policy  
Proterra