PUBLIC COMMENTS IN RESPONSE TO THE DRAFT REPORT TO ADDRESS INCREASING ELECTRIC VEHICLE ACCESS IN OVERBURDENED COMMUNITIES BEFORE THE NEW JERSEY BOARD OF PUBLIC UTILITIES

August 9, 2022

COMMENTS OF TURO INC.

Turo Inc. appreciates the opportunity to provide public comments on the electric vehicle ("EV") transportation study draft report ("draft report"). We applaud the State of New Jersey for their efforts to promote access to, and use of, plug-in electric vehicles in overburdened communities. As a key player in the transition to EVs, with 7% of all completed Turo reservations in New Jersey completed with an EV, in July 2022, Turo provides comments on its existing efforts to enhance the acceleration of electric vehicle adoption and usage while also creating economic opportunities in overburdened communities through our peer-to-peer car sharing platform, including those in New Jersey.

About Turo
Turo is the world's largest car sharing marketplace where guests can book any car they want, wherever they want it, from a vibrant community of trusted hosts. Our peer-to-peer platform connects hosts and guests through our marketplace and is designed to enable guests to book the perfect vehicle for any occasion from our trusted community of hosts. Turo is home to a supportive and collaborative community that shares over 100,000 vehicles on Turo in the United States. In New Jersey Turo has over thousands of active hosts sharing their personal vehicles across the state.

We are pioneering a new category of transportation, advancing the next era of personal mobility by connecting consumers with an unrivaled network of privately owned vehicles. As traditional mobility options do not provide adequate and efficient access for consumers to vehicles, peer-to-peer car sharing delivers to consumers a more convenient and economically efficient way to access an extraordinary selection of vehicles compared to traditional car ownership, car rental and traditional car sharing programs.

How peer-to-peer car sharing works
Peer-to-peer car sharing is a mobility solution that allows individual car owners ("hosts") to share their personal vehicle on an online platform. This new mobility solution is part of a larger trend towards a sharing economy approach to increase access to vehicles and mobility.

Through peer-to-peer car sharing platforms, like Turo, hosts can make their vehicle accessible to other users ("guests"), through our online and mobile interface. Guests in need of a vehicle can select the exact model vehicle they wish to use for their specific purpose, with over 250 makes and models to choose from in the United States. For guests, some of the biggest advantages can be cost and convenience. With Turo, vehicles are also not required to be picked up at certain locations to exchange keys, such as car parks or dedicated car sharing parking spaces. Instead, the car owner and guest identify a location to meet to exchange vehicle keys. This exchange is often quick and typically takes the same amount of time as a traveler hailing a Transportation Network Company ("TNC"). Furthermore, because the key exchange can occur practically anywhere, there are no restrictions or business hours that reduce or limit access to vehicles. Furthermore, through Turo Go many hosts choose to make remote access to their vehicles available.

For hosts, peer-to-peer car sharing offers the ability for car owners to gain extra revenue that can help offset the high cost of car ownership or the costs associated with an electric vehicle. On average, car owners can defray the costs of owning a car by sharing it on Turo. Our community surveys revealed that roughly 75% of car owners who share their vehicle on Turo report that they do so to reduce the cost of ownership, pay down student loans or other expenses, or use their earnings to help make ends meet.

Turo provides tools to accelerate EV adoption
Turo has developed multiple tools to help create awareness about EVs and to help guests overcome known barriers to EV adoption. Enabled on the Turo platform is a "Green Vehicle" filter allowing guests to filter for only electric vehicles as they search for a vehicle for their trip. The electric vehicle filter has proven to be a key tool to reduce barriers for guests to access an EV. As of August 2022, over 6.5% of the total vehicles offered across the US on the Turo platform are EVs, compared to approximately 1% of all the cars in the US being EVs. Additionally, about 7% of all completed Turo reservations in New Jersey, in July 2022, are with an EV. Peer-to-peer car sharing platforms allow people to make journeys by zero emission vehicles where they otherwise not be able to afford this option. The 2022 Turo-conducted survey of our community found that 60% of guest-respondents disclosed they are likely to book an EV for their next trip and 69% of guest-respondents indicated they are looking to purchase an EV in the next five years.

Through giving users the experience of making a journey with an electric vehicle, peer-to-peer car sharing platforms also help combat range anxiety and other barriers to uptake. Turo is a key player in the transition to EVs with guests turning to Turo to book an EV as part of an "extended test drive" to help inform their vehicle purchase. A survey of Turo guests from 2022 reported that of guests who intend to purchase an EV, they are more likely to turn to Turo to test drive an EV than a friend or family, car dealership, rental car company or traditional car sharing service.

As a platform, Turo provides a wealth of information to our community on EVs including guides on [every EV listed on Turo](#), details about EVs such as the [Lucid Air](#) or [Rivian truck](#), and a ranking of [the best new EVs for 2022](#). Additionally, Turo provides a [free tool](#) for hosts to help them identify potential earnings from sharing a vehicle on our peer-to-peer car sharing platform. These information resources provide consumers with information to overcome the known knowledge gaps that exist with EV adoption.

Accessible and affordable electric vehicles
Peer-to-peer car sharing can act as a catalyst for the adoption of zero emission vehicles where active travel or public transport options are not realistic. In contrast to fleet-based models, such as ZipCar or BlueLA, or traditional car rental providers who are the single biggest purchasers of new vehicles, peer-to-peer car sharing utilizes existing vehicles, including new electric vehicles, in the mobility ecosystem. Furthermore, Turo does not impose a monthly membership fee to its users making the platform more accessible and available to users, including those in overburdened communities. Our platform creates access to those on lower incomes to low emission and electric vehicles without having them meet the upfront cost of purchasing one outright.

Through providing convenient access at numerous price points, Turo is growing on-demand vehicle access to an expansive range of guests. Additionally, at the time of booking a vehicle on Turo guests are made aware of the total price and payment is made at the time of reservation. This is in comparison to ride-hailing services (TNC) where the total price fluctuates based on demand, driver availability, time of day, waiting times, tolls or other additional fees and charges implemented by the ride-hailing services, and the payment is not processed until the trip is completed. In the past year, over 71% of Turo guests surveyed indicated that they used peer-to-peer car sharing because it was more affordable than TNCs (ride-hailing).

Empowering overburdened communities

Turo serves as a solution to economically help overburdened communities. According to a 2022 Turo-conducted community survey, 58% of Turo host-respondents self-identified as non-white and over 20% of host-respondents self- identified as an immigrant or refugee. Through our peer-to-peer car sharing platform, individuals take an expensive and costly asset, their personal vehicle, and generate revenue from it as a means to help overcome the cost of living. In a study with DePaul University, it was found that a low-income family could increase their household income by 10% through sharing their vehicle for less than 8 days a month. Our own survey data suggests that a majority of Turo host-respondents cover primary expenses or add to savings with the income generated through sharing their vehicle on Turo. Turo hosts whose annual household income was less than $75,000 indicated in their community survey responses that their earnings from peer-to-peer car sharing are used to 1) pay car ownership costs (such as maintenance, fuel, parking), 2) pay immediate expenses (rent/mortgage, utilities, food costs) and 3) pay down personal debts (credit card, student loan(s)).

Turo is committed to helping make vehicle ownership more obtainable, especially for those in overburdened communities, by providing up to [$1 million in funding](#) and access to interest-free investment opportunities to aspiring entrepreneurs in the United States through its Seed Host program. This program is specifically focused on helping those in [underserved communities](#).

According to the same 2022 Turo-conducted survey, 65% of host-respondents who own an EV list it on Turo to help offset the cost of owning the vehicle. Even after government funded EV incentives, the cost of purchasing an EV is still a financial burden, especially for those living in overburdened communities. This burden is exacerbated when access to public EV charging stations is limited. Through Turo, the cost of an EV, either new or used, can be offset through sharing the vehicle when it is unused by the car owner.

The benefits of peer-to-peer car sharing are also more widely distributed across geographical areas and parts of the state than other forms of shared mobility. Traditional car sharing and ride-hailing programs largely service well-off urban or metropolitan areas, often leaving rural and overburdened communities without access to their mobility service. This contrasts with Turo, where vehicles can be made available virtually anywhere, including in overburdened, rural, or more isolated communities.

PUBLIC COMMENTS ON THE STATE ENERGY PROGRAM COMPETITIVE PROGRAM 2017 NEW JERSEY UNDERSERVED COMMUNITIES ELECTRIC VEHICLE AFFORDABILITY PROGRAM (DOCKET NO. QO19010099)

Comment:
The inclusion of emerging car sharing programs, specifically peer-to-peer car sharing, should be included as part of the research efforts prior to the report being final. Limiting the scope to examine exclusively EV fleet-based car sharing services reduces the opportunity to make a significant impact in expanding EV accessibility and use in overburdened communities. Consideration in the development of the recommendations should be given to a variety of shared mobility providers and not exclusively to incumbent existing services (i.e.: non-emerging) including TNCs, traditional car sharing membership programs, and EV car sharing programs. Expanding the scope of the research to include peer-to-peer car sharing programs aligns with the New Jersey Board of Public Utilities' statement in their submission to the U.S. Department of Energy that "the Project Team will explore the feasibility of various existing/emerging PEV vehicle sharing models that presently exist" (Subtask 3.1: PEV Sharing).

Comment on Recommendation 1: Develop a Used EV Incentive Program
Turo supports the intent that an additional incentive for used EVs can facilitate increased EV adoption in overburdened communities. However, consideration should not be limited "to those who purchase an EV with the intent of operating as a TNC driver." Alternative to limiting the scope of this recommendation to one mobility service, the New Jersey Board of Public Utilities should aim to be platform and mobility service neutral. Neutrality will allow for other mobility options, including users who intend to share an EV on a peer-to-peer car sharing platform, to be eligible for consideration of this incentive.

Comment on Recommendation 3: Develop a Level 2 Home Installation Incentive for Ride-hailing Drivers
Turo supports the intent that creating additional accessibility for EV charging at homes in overburdened communities can facilitate increased EV adoption. However, consideration should not be limited "to those who operate an EV for ride-hailing purposes". Alternative to limiting the scope of this recommendation to one mobility service, the New Jersey Board of Public Utilities should aim to be platform and mobility service neutral. Neutrality will allow for additional individuals, including those intending to share an EV on a peer-to-peer car sharing platform, eligible for consideration of this incentive.

Comment on Recommendation 5: Establish Advantageous Charging Rate for EV Ride-hail Driving in Overburdened Communities
Turo supports the intent to reduce the cost burden of EV charging when providing a mobility solution. However, consideration should not be limited to EV ride-hail drivers. Alternative to limiting the scope of this recommendation to one mobility service, the New Jersey Board of Public Utilities should aim to be platform and mobility service neutral. Neutrality will allow for additional individuals, including those intending to share an EV on a peer-to-peer car sharing platform, eligible for consideration of an advantageous charging rate.

Comment on Recommendation 8: Develop Neighborhood Charging Lots
Turo supports the intent to develop neighborhood EV charging lots. We would welcome the opportunity to have a conversation with relevant stakeholders to discuss this recommendation and best practices to ensure that the proposed charging lots are both accessible and equitable for EV mobility services and providers.

We applaud the State of New Jersey's efforts and appreciate the opportunity to provide comments on the recommendations included in the draft report. Additionally, we appreciate the opportunity to provide further recommendations to the State on how peer-to-peer car sharing can further the State's goals to promote the access and use of electric vehicles in overburdened communities.

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