Clean Vehicle Rebate Project: Rebate Now Pilot

Status Report

Assessment of the Rebate Now Pilot administered through the Clean Vehicle Rebate Project

Prepared on behalf of the California Air Resources Board

Center for Sustainable Energy™

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Center for Sustainable Energy

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I. Executive Summary

The Center for Sustainable Energy (CSE) has administered the Clean Vehicle Rebate Project (CVRP) on behalf of the California Air Resources Board (CARB) since 2010 as part of CARB's Climate Change Investment program. CVRP provides rebates to qualified customers for the purchase/lease of an eligible electric vehicle (EV), including battery EVs, plug-in hybrid EVs, fuel cell EVs, and zero-emission motorycycles.

CVRP rebates are issued *after* a customer has purchased/leased an EV, which can be a barrier for lower-income car buyers looking to acquire a new EV. Prior studies indicate that low-income EV car shoppers who are aware of the State's clean vehicle incentives may not be able to afford the upfront price and wait for reimbursement.[1] Pre-qualification for CVRP could make the difference between a customer choosing a new EV over a gas alternative.

Senate Bill (SB) 1275 (De León, 2014), among other things, directed CARB to consider converting CVRP to a prequalification and/or point-of-purchase rebate to address the upfront capital costs of a new EV. In response, CARB directed CSE to launch the CVRP Rebate Now Pilot (Rebate Now) in January 2018 for residents of San Diego County. Eligible customers would be pre-qualified for a CVRP rebate *prior* to their purchase/lease of a new EV. Customers would have the choice of either redeeming the preapproval voucher with a participating dealership at the point of purchase, thereby lowering the total purchase/lease price of a new EV, or "self-claiming" the rebate in which customers choose to have the rebate mailed to themselves after purchasing/leasing a new EV.

This status report summarizes Rebate Now participation results from January 30, 2018, to June 30, 2019. During this period, CSE disbursed a total of 931 Rebate Now rebates; however, less than 2% (16) were redeemed by a participating dealer at the point of purchase. The vast majority of Rebate Now participants who received a rebate self-claimed it after the purchase/lease of their EV.

Pre-qualification for CVRP could make the difference between a customer choosing a new EV over a gas alternative.

Rebate Now did attract a greater proportion of applications from income-qualified customers (household income less than 300% of the federal poverty level) than traditional CVRP in San Diego. Applications for the increased rebate represented 16% of the total applications received for Rebate Now compared to 6% of the total applications received for the traditional CVRP program in San Diego. However, the proportion of increased rebates approved and redeemed was more similar between

[1] California Air Resources Board. 2018. Low-Income Barriers Study, Part B: Overcoming Barriers to Clean Transportation Access for Low-Income Residents (p. 30). Retrieved 20 September 2018 from https://ww2.arb.ca.gov/sites/default/files/2018-08/sb350_final_guidance_document_022118.pdf.

Rebate Now and CVRP, 7% compared to 6% respectively. Nevertheless, the heightened interest from Rebate Now income-qualified applicants for the increased rebate supports the underlying premise that pre-qualification is important to low- and moderate-income (LMI) car shoppers.

In addition to summarizing program results, this report includes the following key findings:

1. Rebate Now had a much higher cancellation rate than the traditional CVRP program statewide.
2. Rebate processing times did not align with applicants' purchasing decisions.
3. Dealer enrollment did not translate into dealer redemption of customers' preapproval vouchers.
4. While the survey data is limited, a couple of factors may have discouraged dealerships from participating in the program.

The impact of Tesla sales on Rebate Now is significant. The Tesla direct sales model is incompatible with the dealer redemption option of Rebate Now, which was the primary motivation for launching the Rebate Now Pilot. At the same time, Tesla models constituted nearly 60 percent of the vehicles rebated through Rebate Now via the customer self-claim option, which can only occur after the vehicle has been purchased. As such, many of the program's overall statistics are skewed by the high volume of self-claimed rebates for Tesla models for which a dealer-redemption option is not available.

II. Background

Clean Vehicle Rebate Project

The Clean Vehicle Rebate Project (CVRP) promotes clean vehicle adoption in California by offering to qualified customers for the purchase/lease of an eligible electric vehicle (EV), including battery EVs, plug-in hybrid EVs, fuel cell EVs, and zero-emission motorycycles.

Rebate Amounts by Type of Electric Vehicle (EV)[2]

Vehicle Type	Standard Rebate ($)	Increased Rebate ($)
Zero-Emission Motorcycle	$900	-
Plug-in Hybrid EV	$1,500	$3,500
Battery EV	$2,000	$4,500
Fuel Cell EV	$5,000	$7,000

Since March 2010, the Center for Sustainable Energy (CSE) has processed rebate applications as the administrator of CVRP on behalf of the California Air Resources Board (CARB). Effective March 2016, and revised again in November 2016, CVRP was amended to include two income-based eligibility components: (1) an income cap that excludes high-income consumers from eligibility and (2) an increased rebate for consumers with household incomes less than or equal to 300% of the federal poverty level (which is defined each year and based upon household size). CVRP also added rebates for fleets, including an increased rebate for public fleets in disadvantaged communities. For more information on CVRP fleet rebates, visit: https://cleanvehiclerebate.org/eng/fleet.

Current Income Caps by Tax Filing Status

Single Filers	Head-of-Household Filers	Joint Filers
$150,000	$204,000	$300,000

If CVRP funds are available, eligible California residents can apply for a CVRP rebate *after purchasing or leasing* an eligible vehicle. In this way, CVRP "cash" rebates are a distinct but complementary, or "stackable," incentive in addition to the federal tax credit (FTC) for the purchase/lease of an eligible EV and regional incentives.

[2] This table reflects the rebate amounts during the Rebate Now evaluation period of January 30, 2018, to June 30, 2019, and does not reflect the current rebate amounts effective December 3, 2019.

For example, CVRP can also be combined with Clean Cars 4 All (CC4A), which is a separate CARB Climate Change Investments program available in and administered by select air districts, that provides incentives to lower-income California drivers to scrap their older, high-polluting car and replace it with a zero- or near-zero emission replacement. Unlike CVRP rebates and FTC incentives, CC4A incentives can be claimed by lower-income car shoppers *at the point of purchase* of an eligible vehicle.

Finally, CVRP complements the financing option of the Clean Vehicle Assistance Program (CVA Program), which provides low-interest loans to low-income car buyers. The CVA Program also offers a grant for the purchase/lease of a new or used EV.

Charge Ahead California Initiative

The Charge Ahead California Initiative (SB 1275, De León, Statutes of 2014, Chapter 530) required several significant changes to CVRP, such as introducing income caps as an eligibility requirement. The bill also directed CARB to adopt revisions to CVRP to ensure consideration of the conversion to pre-qualification and point-of-purchase rebates or other methods to increase participation rates (Section 44528.4(c)(3)(C) of the Health and Safety Code).

CARB staff held multiple public work group meetings to discuss several long-term program considerations for CVRP, including transitioning the incentive to a time-of-purchase discount by offering a pre-qualification option. During the work groups, CARB staff posed the following key considerations to stakeholders.

- **Annual vs. Continuous Appropriation:** Historically, CVRP's funding source is an annual appropriation that varies from fiscal year to fiscal year. A point-of-purchase incentive may be challenging to implement without a continuous appropriation. While CARB staff recognized that funding uncertainty currently exists, this factor is compounded when the rebate is moved closer to the point of purchase because of the amount of lead time needed to notify dealers and the public when funding is running low. In particular, a pre-qualification program would increase requirements for funds reservations while applications were reviewed and processed.
    - Stakeholders agreed that a pre-qualification approach would be feasible and compatible with annual appropriations.

- **Verification and Enforcement:** Verification and enforcement of key CVRP program requirements (e.g., income eligibility, ownership requirements, etc.) could be challenging. CARB staff believed there would need to be a pre-qualification element to any point-of-purchase redesign of CVRP to satisfy income verification requirements (both higher rebates for lower-income consumers and the income cap) prior to issuing rebates to safeguard against fraud.
    - Stakeholders agreed that a pre-qualification approach would enable the project to maintain the income requirements and that it was important to do so.

- **Increasing Complexity:** The introduction of income eligibility requirements already added a significant change to CVRP. Modifying the project design further could add complexities,

confuse consumers and ultimately add to dealer responsibilities. CARB staff believed, however, that the addition of a pre-qualification process, in addition to maintaining the option to apply for a rebate after purchase, would help to minimize consumer confusion about eligibility.

Following a lengthy work group process, and based on extensive stakeholder feedback, CARB staff authorized CSE to launch the CVRP Rebate Now pre-qualification pilot in San Diego County. Given the range of concerns and considerable uncertainty about consumer and dealer response to a pre-qualification program, a regional program was broadly accepted as a reasonable approach to gauge the response and impacts prior to pursuing a design overhaul of CVRP statewide. Outreach to dealerships in San Diego County began in November 2017 and the program was formally offered to the new car buyers in January 2018.

In addition to launching Rebate Now on a limited regional basis in San Diego County, CARB approved several other key program design parameters. Participation is not limited to applicants for the increased rebate—applicants for either the standard or increased rebate can participate. Processing of Rebate Now applications is not prioritized over traditional CVRP applications. In order to protect against fraud, 100% of Rebate Now applications are subject to income verification. Lastly, dealerships are required to enroll with CSE to setup ACH transactions prior to being able to redeem customer vouchers.

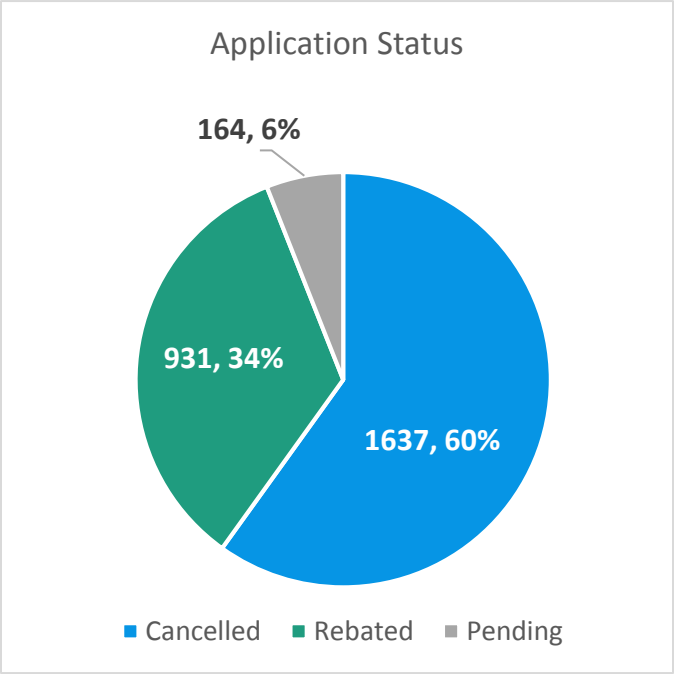
The purpose of this status report is to continue the iterative discussion regarding a pre-qualification approach to converting CVRP to a point-of-purchase program by assessing and summarizing the Rebate Now results from program launch through June 30, 2019.

III. Rebate Now Pilot Statistics

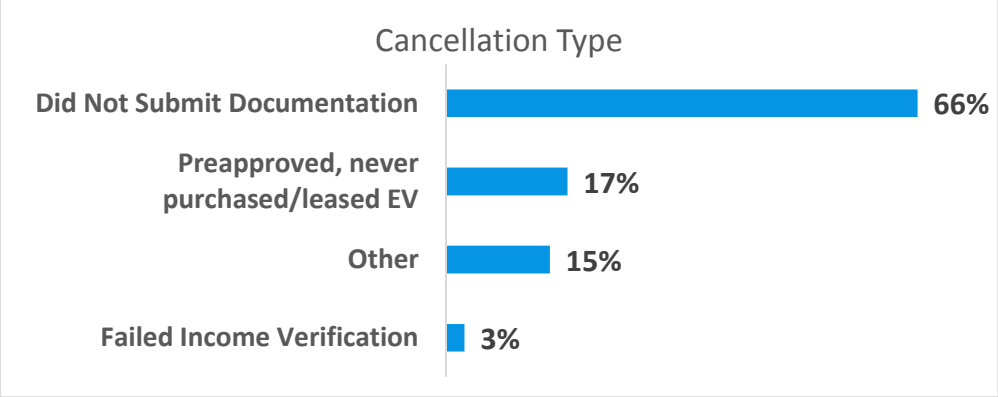
The following are the key program statistics for Rebate Now from pilot launch on January 30, 2018, through June 30, 2019. For context, Tesla vehicles are eligible for Rebate Now despite Tesla's lack of a dealer franchise model and the inability of customers to redeem a Rebate Now voucher at the point of purchase, which was the goal of the pilot program. At the same time, nearly 60% of the rebates provided through Rebate Now were for Tesla models (see p. 15-16 for more discussion on Tesla).

Application Statistics

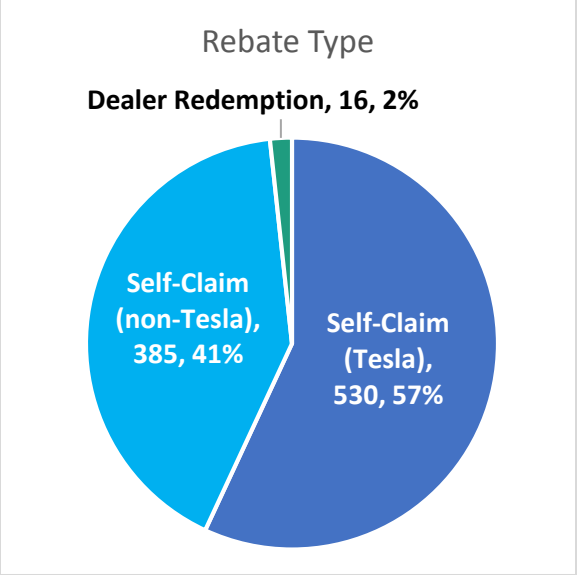
- CSE received a total of 2,732 Rebate Now pre-qualification applications.
  - Sixty percent (1,637) of applications were canceled.
  - Thirty-four percent (931) received a rebate.
  - Six percent (164) were still pending at time of analysis.

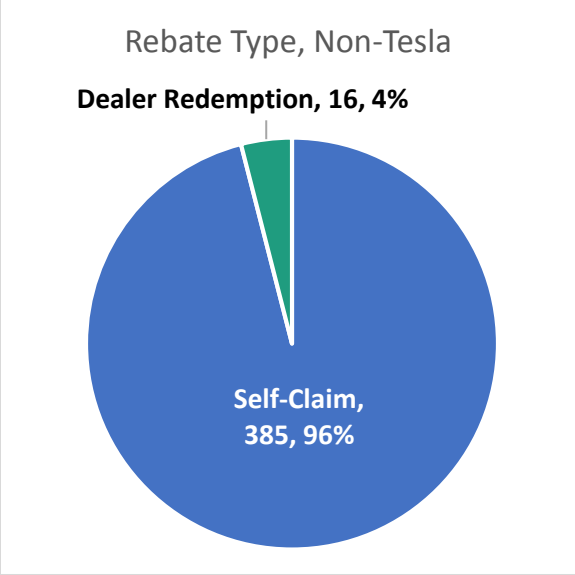


- Of the 1,637 applications that were canceled:
  - Sixty-six percent (1,079) did not submit the required documentation for income verification.
  - Seventeen percent (278) were pre-approved, but did not acquire an EV.
  - Three percent (42) failed income verification.
  - Fourteen percent (238) of applications were canceled for other reasons.



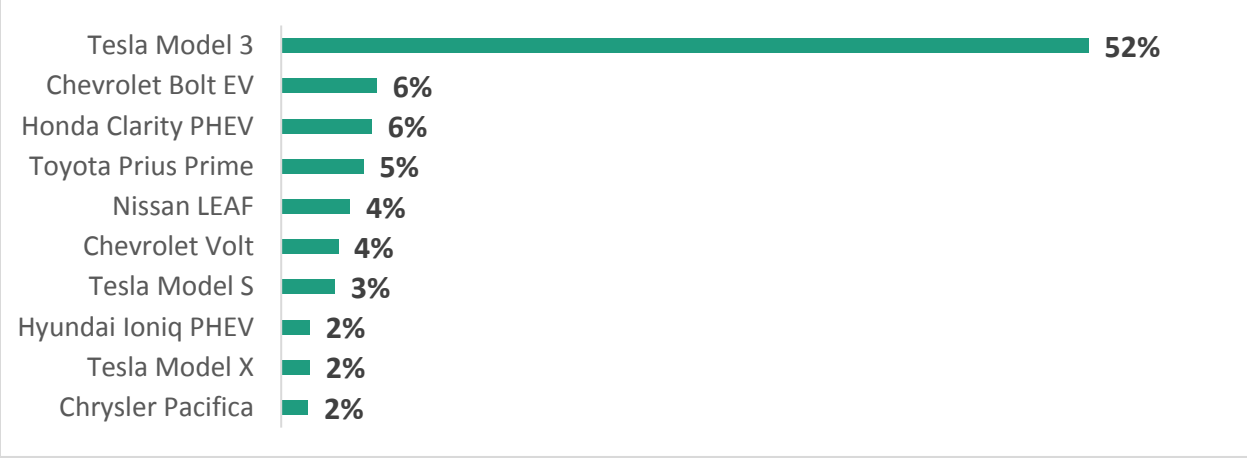
- Of the 931 applications that received a rebate:
  - Ninety-eight percent (915) were self-claimed after the purchase or lease of a new EV.
    - Fifty-seven percent (530) were self-claimed for Tesla vehicles for which dealer redemption was not an option.
    - Forty-one percent (385) were self-claimed for non-Tesla vehicles.
  - Two percent (16) were dealer-redeemed as a point-of-purchase rebate.
    - Excluding Tesla vehicles for which dealer redemption was not an option, dealer redeemed rebates represents 4% of the non-Tesla rebates.



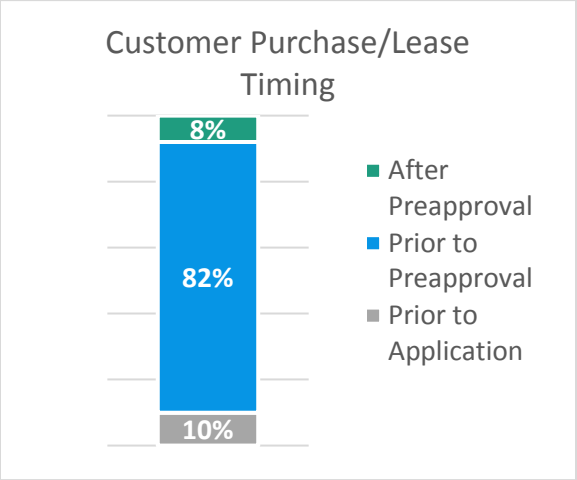


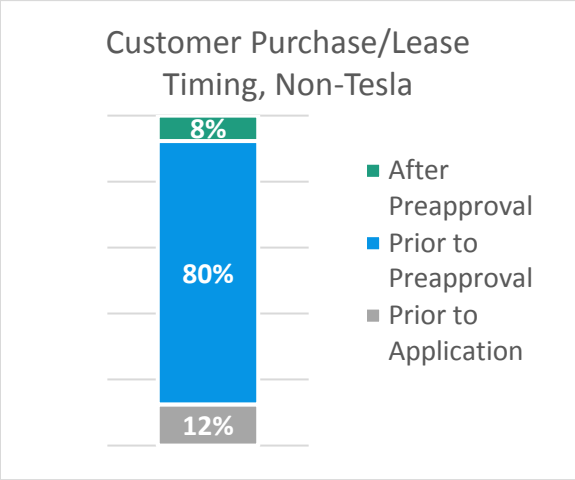
Customer and Vehicle Statistics

- The ten most rebated EVs through the Rebate Now were as follows (see "Tesla Participation in Rebate Now" section on p. 15-16 for more context).

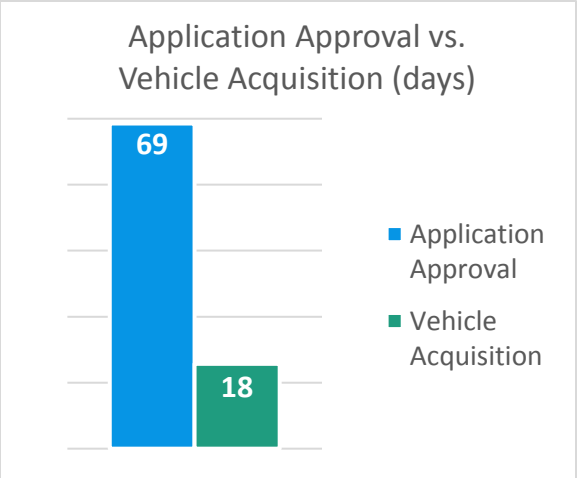


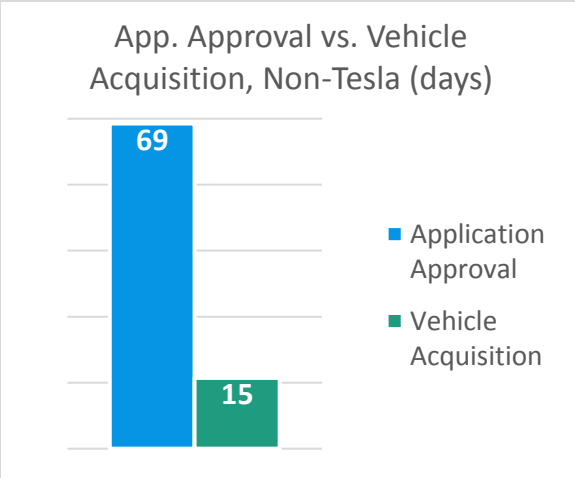
- Of the 931 applicants who received a Rebate Now rebate:
  - Eight percent (73) received rebate preapproval prior to purchasing/leasing an EV.
  - Eighty-two percent (761) purchased/leased an EV *prior to receiving rebate preapproval*.
  - Ten percent (97) applied for a rebate *after* purchasing/leasing an EV.
  - There was not a significant difference between Tesla and non-Tesla participants.





- The average timeline for approval of Rebate Now applications greatly exceeded the average timeline for a customer to purchase or lease a new EV.
  - On average, it was 69 days from when applicants submitted a pre-qualification application to when CSE approved the application.
  - On average, it was 18 days from when applicants submitted a pre-qualification application to when applicants purchased/leased a new EV.
  - Excluding Tesla vehicles for which dealer redemption was not an option, on average, it was 15 days from when applicants submitted a pre-qualification application to when applicants purchased/leased a new EV.

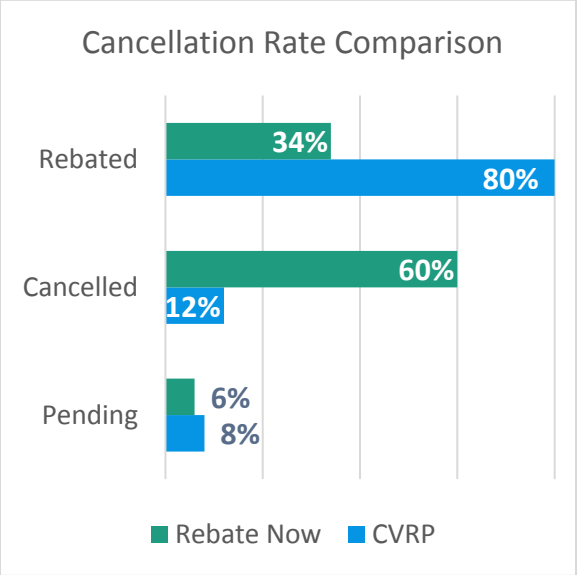


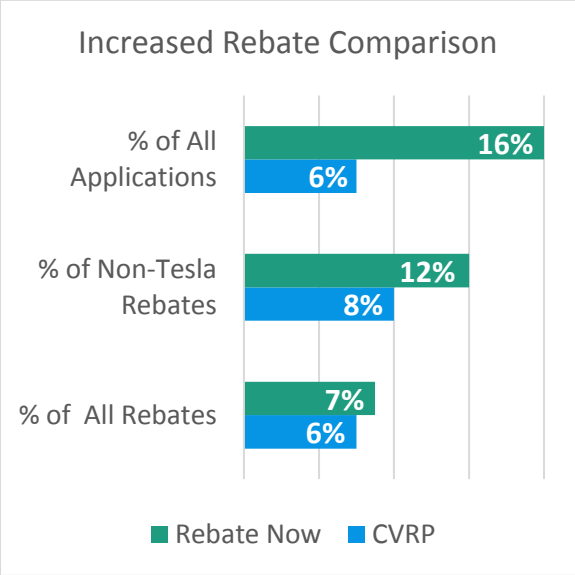


San Diego County: Traditional CVRP vs. Rebate Now Comparison

CSE first evaluated Rebate Now by comparing application statistics to traditional CVRP program statistics for San Diego County over the same time period.

- Traditional CVRP program received 9,581 applications from San Diego County residents—more than 3.5 times the applications of Rebate Now.
    - In other words, Rebate Now represented about 22% of the total San Diego applications to CVRP during the time period.
- Eighty percent (7,628) of the applications received through the traditional San Diego CVRP process were rebated, compared to the 34% (931) through Rebate Now.
- Increased rebates represented 16% (445) of the applications received for Rebate Now compared to 6% (610) of the applications received through the traditional San Diego CVRP process.
- Increased rebates represented 7% (69) of the total rebates provided from Rebate Now compared to 6% (434) of total rebates provided through the traditional CVRP process.
- Excluding Tesla vehicles, Rebate Now provided 50% more increased rebates than the traditional San Diego CVRP process (12% vs. 8%).





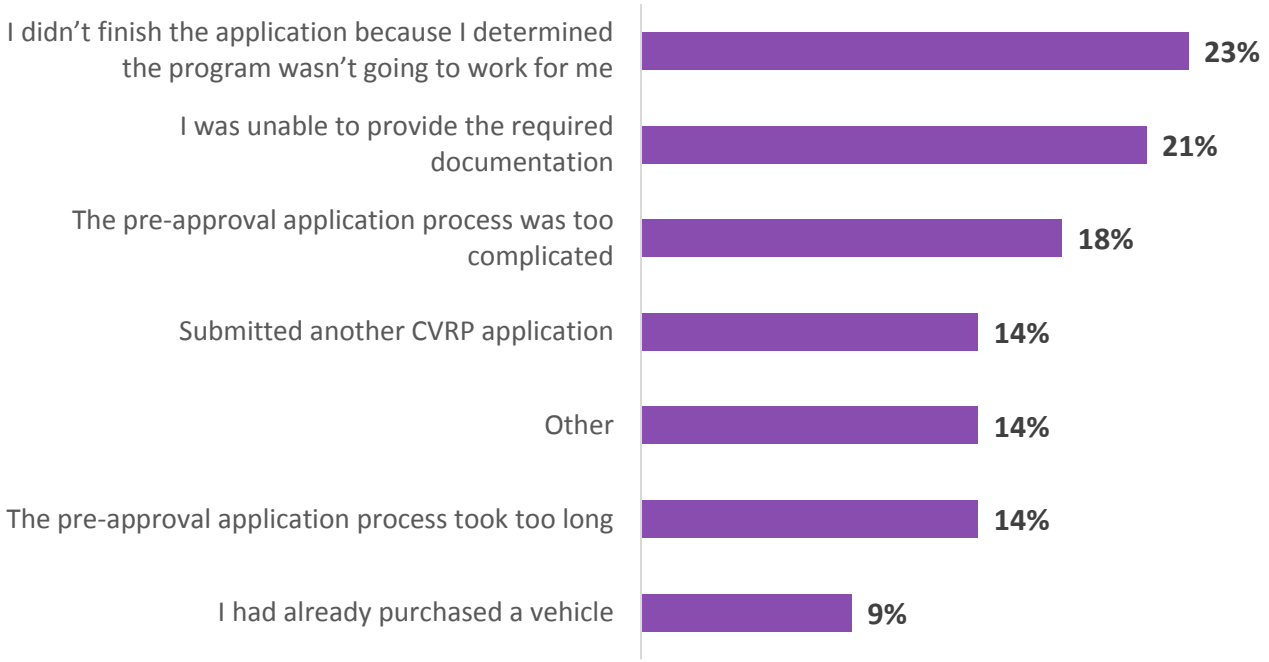
Rebate Now Applicant Survey

CSE surveyed participants to better understand customers' experience with Rebate Now as well as their decision-making process. The survey covered a range of topics, including program awareness, program satisfaction, dealership experience and their reasons for cancelling an application. The total number of responses to some questions were too small to analyze and are therefore not discussed in this report.

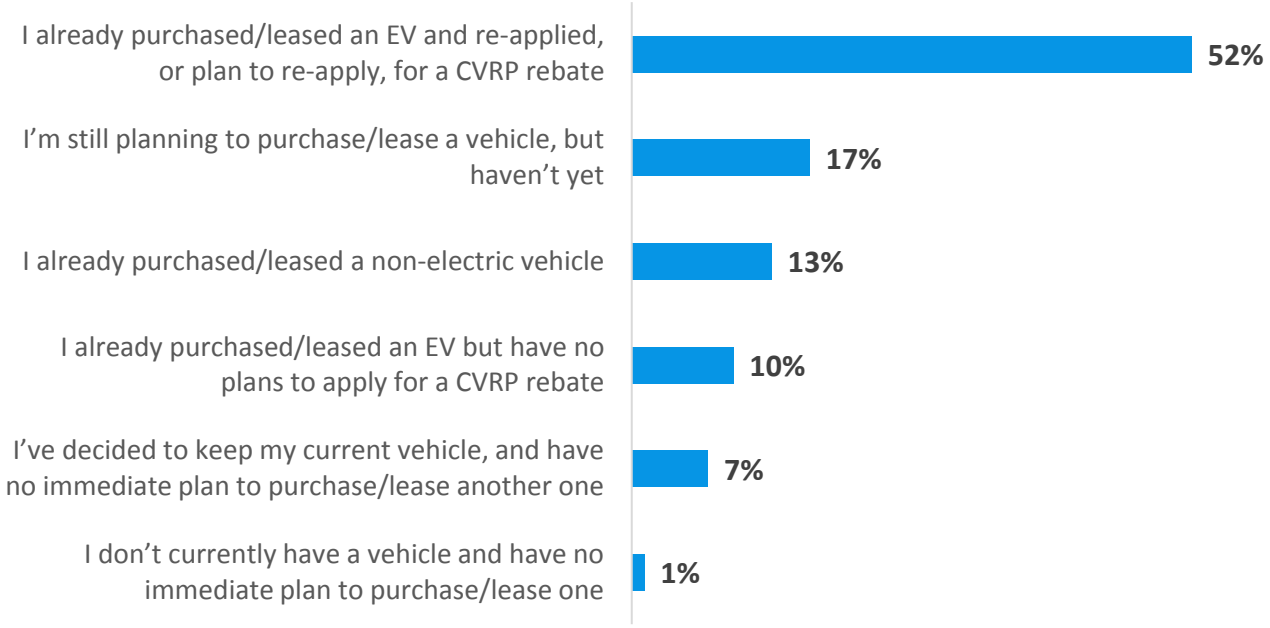
Rebate Now Applicant Survey Responses	
Data Characterizes Applications Received	January 30, 2018, thru October 31, 2018
Inclusion Criteria	Application was either approved or canceled (applications still in progress are not included)
Program Population (N)	1,554
Program Population Surveyed	1,503*
Survey Administration Dates	February 13, 2019, thru March 4, 2019
Survey Responses (total n)	256 (17% response rate) 172 rebate recipients/84 canceled applicants

** Fifty-one applicants were not surveyed because their application status was still in progress when survey was launched, they failed income verification or their application was canceled after they acquired a vehicle.*

Participants whose application was canceled were asked the following question, *"You applied to be preapproved for an EV rebate through Rebate Now but did not receive preapproval. Please tell us why?"* Of those who responded to the survey question (unweighted n = 54), the results are as follows.



Canceled applicants were also asked, *"What are your current vehicle shopping plans?"* Of those who responded to the survey question (unweighted n = 84), the results are as follows.



The responses to the above survey question indicate that while Rebate Now had a much higher cancellation rate than traditional CVRP, many (52%) of those canceled Rebate Now Pilot applicants proceeded or planned to apply for a traditional CVRP rebate.

IV. Discussion

The following are select key findings based on analysis of the program statistics as well as participant feedback collected via the Rebate Now Applicant Survey.

Key Finding #1: Rebate Now had a much higher cancellation rate than the traditional CVRP program statewide.

- CSE compared the cancellation rate to those selected for income verification in the traditional CVRP program statewide because Rebate Now is 100% income verified.
- The cancellation rate for Rebate Now (100% income-verified) is considerably higher than the cancellation rate of income-verified applicants for CVRP statewide — 49% vs. 28%.

> ***"It is a burden for low-income households to produce multiple documents related to income verification…people rent rooms to nonfamily members." --survey respondent***

Key Finding #2: Rebate processing times did not align with applicants' purchasing decisions.

- Of the applicants that participated in Rebate Now, 92% purchased an EV before receiving preapproval.
- The average number of days from applying for preapproval and purchasing an EV was 18 days; in contrast, the average number of days from applying for preapproval and receiving preapproval was 69 days.

> ***"It took WAY too long. People looking to buy a car aren't going to wait 3–6 months for preapproval." --survey respondent***

- CARB determined from the outset that Rebate Now applications would not receive priority processing over traditional CVRP applications. The rationale for this decision was that CARB did not want to provide an additional advantage to San Diego County residents.
- As Rebate Now applications were not prioritized over traditional CVRP program applications because of the pilot's regional limitiation, the preapproval process was subject to the same delays caused by the inundation of applications from Tesla Model 3 owners that increased processing time for traditional CVRP applications as well beginning in July 2018.

- Another source of delay was 100% income verification of Rebate Now applications, which is a resource-intensive and time-consuming process.

- According to the survey data, customers' lack of understanding of the program rules played a part as well in some customer decisions to purchase an EV prior to receiving preapproval.
    - Twenty-five percent of survey respondents indicated that they did not know they needed to wait to be preapproved prior to purchasing or leasing their vehicle.
    - The result is that the Rebate Now application approval process was three times longer than the average time frame in which applicants purchased their vehicles.

Key Finding #3: Dealer enrollment in Rebate Now did not translate into dealer redemption of customers' preapproval vouchers.

- Rebate Now had an initial target of enrolling at least 15 dealerships into the program. As of June 30, 2019, 38 dealers—out of 93 in San Diego County with CVRP-eligible EVs, excluding two Tesla stores—had completed enrollment.

- However, of the applicants that participated, excluding Tesla drivers, only 16, or 4%, were redeemed by a participating dealership.

> ***"If more dealerships would know about and honor the program it would be great."***
> ***--survey respondent***

- The ability to receive the value of the rebate at the time of purchase/lease was one of the key benefits invisioned for Rebate Now. That so few consumers chose to utilize this feature is surprising and raises questions about the value of the prequalification element as currently designed.

- While 38 dealerships exceeded initial program expectations, it still means that most San Diego County dealerships with CVRP-eligible vehicles were and are not currently participating in the Rebate Now, adding a layer of confusion and complication for customers.
    - Excluding Tesla, only 39% of rebated applicants purchased or leased their EV from a participating Rebate Now dealership.

Key Finding #4: While survey data is limited, a couple of factors may have discouraged dealerships from participating in the program.

- CSE conducted a survey of San Diego dealerships to better understand their perspective of Rebate Now but did not receive sufficient responses to constitute a meaningful sample size with which findings could be extrapolated.
- Based on the limited survey results and anecdotal feedback collected from dealers by CSE outreach staff, the following factors may have discouraged more dealerships from participating in the program:

- The enrollment process to become a CVRP Rebate Now Pilot participating dealership is cumbersome and cannot be completed online.
- The volume of CVRP-eligible EVs on some dealers lots were few or none and, therefore, enrolling was not a priority.
- There anticipated volume of CVRP Rebate Now Pilot vouchers was low and as such did not warrant the investment of dealer sales staff time and resoures.

Tesla Participation in Rebate Now

Tesla was excluded from the Rebate Now list of participating dealers due to Tesla's direct distribution model. Tesla does not have a traditional franchise dealer network model where a customer walks into a dealership, purchases the vehicle and drives home with the vehicle the same day. Instead, as all Tesla locations are corporate-owned assets, Tesla reaches the consumer via direct ordering of custom-built vehicles that are shipped to the customer from the factory. Timing on delivery is inconsistent, as the orders are batched by options and various trims for improved efficiency, making it difficult to fit within the guidelines of the Rebate Now implementation.

Once a Rebate Now application is preapproved, applicants have 14 days to complete the vehicle purchase and are only able to request one extension period. Once the extension period has expired, the Rebate Now application is canceled, and potential rebate applicants must submit a new application. While Tesla is not included in the Rebate Now list of participating dealerships, Tesla customers are eligible to participate if they self-claim their rebates.

Fifty-eight percent (530 of 915) of Rebate Now self-claimed rebates are for Tesla vehicles. Tesla's direct distribution sales model allows Tesla customers to order a vehicle and apply for Rebate Now simultaneously, whereas consumers purchasing vehicles from other original equipment manufacturers (OEMs) must wait until they are approved for Rebate Now before purchasing a vehicle. The extension in the Tesla sales cycle compliments the Rebate Now approval processing timeline. Other OEMs offering high-volume sales models target consumers that need vehicles immediately where the Rebate Now approval process is incompatible within their sales cycle model.

The impact of Tesla sales on Rebate Now is significant. The Tesla direct sales model is incompatible with the dealer redemption option of Rebate Now, which was the primary motivation for launching Rebate Now. At the same time, Tesla models constituted nearly 60 percent of the vehicles rebated through Rebate Now via the customer self-claim option, which can only occur after the vehicle has been purchased. As such, many of the program statistics are skewed by the high volume of self-claimed rebates for Tesla models for which a dealer-redemption option is not available.

V. Conclusion & Considerations

Conclusion

Rebate Now, by and large, did not achieve its primary goal of equipping customers with a rebate that they could use to lower the purchase/lease price at the dealership. The primary factor for this outcome is most likely the significant difference in the average time it took for a customer's prequalification application to be approved and the average time for a customer to purchase/lease a new EV. The Rebate Now approval process was hindered by a dramatic increase in application volume, beginning in July 2018, driven by the popularity of the Tesla Model 3, which also more than doubled the approval tim of traditional CVRP applications. Additionally, income verification, in and of itself, typically takes 10 to 15 days to complete.

Since the end of June 2019, which is when this study period concluded, application processing times have been substantially reduced for both traditional CVRP and Rebate Now. CSE has implemented system improvements to achieve processing efficiencies, as well as hired additional rebate processing specialists to handle the volume of rebate applications. As such, one of the major program challenges has already been addressed.

While the initial implementation of Rebate Now was not as successful as hoped, the impetus and need for establishing a CVRP pre-qualification program remains. 2017 research[3] notes that point of purchase financial incentives have been found to be the most effective for spurring adoption of EVs (as compared to tax credits and other post-purchase financial incentives). Policy makers are urged to apply purchase incentives at the point of purchase.

Similarly, 2016 research[4] compared the effectiveness of point of purchase vs. after-purchase financial incentives. Post-purchase rebates, such as CVRP, provide consumers with a cash payment after they have purchased their vehicles and consumers still need to have the financial ability to initially purchase the vehicle. Post-purchase rebates therefore may be effective in promoting EV markets for higher income households, but not for households who could not afford the purchase price of an EV.

SB 1275 inteded to provide lower-income car shoppers with a more effective financial incentive that could be applied at the point of purchase. This underlying premise is still relevant as the purchase price of new EVs are still beyond the ability of many lower-income car shoppers to pay unassisted.

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[3] Hardman, S, Chandran, A., Tal, G., Turrnetine, T. (2017). The effectiveness of financial purchase incentives for battery electric vehicles – A review of the evidence. Renewable and Sustainable Energy Reviews 80 1100–1111. Available: https://phev.ucdavis.edu/wp-content/uploads/2017/09/purchase-incentives-literature-review.pdf

[4] Yang, Z., Slowik, P., Lutsey, N., Searle, S. (June 2016). Principles for effective electric vehicle incentive design. International Council on Clean Transportation White Paper. Available: https://theicct.org/sites/default/files/publications/ICCT_IZEV-incentives-comp_201606.pdf

Considerations

Combine Rebate Now and Clean Cars 4 All

While the Rebate Now prequalification means an income-qualified customer could reduce the purchase price of a BEV by $4,500, that's likely insufficient for many car shoppers with a household income at or below 300% of the federal poverty level. However, combining the CVRP Increased Rebate through Rebate Now with the Clean Cars 4 All voucher could provide $13,000 and $14,000 for the purchase of a new CVRP-eligible PHEV and BEV respectively. Together, the CVRP Increased Rebate and Clean Cars 4 All could provide a financial pathway for more lower-income car shoppers to acquire a new EV.

Loss of the federal tax credit

According to a UC Davis blog[5], surveys show that nearly 30% of consumers who bought EVs in early markets cited the EV credit as a factor that influenced their purchasing decisions. Almost half of Nissan Leaf buyers and 40% of Chevrolet Volt buyers said that they would not have purchased their cars without the credit incentive. As such, the complete phase out of the federal tax credit for Tesla on January 1, 2020, and for GM on April 1, 2020, is anticipated to adversely impact EV adoption. With support from the federal government for EVs waning, there is an even greater need for more meaningful state incentives for the purchase/lease of a new EV. Rebate Now prequalification providing an option for a car shopper to apply the CVRP incentive at the point of purchase is a modest step towards filling the gap left by the disappearing federal tax credit.

Continue Rebate Now in San Diego

As Rebate Now has not thus far performed up to expectations, it may be premature to expand the program statewide. However, given the improvements in rebate processing time, investment of time and resources to establishing the program, a recent uptick in dealer redeemed vouchers at the end of 2019, and a forthcoming Clean Cars 4 All program launching in San Diego, CSE suggests continuing Rebate Now in San Diego through the calendar year 2020 and reassessing the program's performance in early 2021 to determine next steps for the program. Furthermore, the one area where Rebate Now has succeeded in is providing 50% more increased rebates than the traditional San Diego CVRP process (excluding Tesla). Continuing and/or expanding Rebate Now may yield the most benefits to priority populations.

Expand to Air District with operational CC4A program

As Clean Cars 4 All is not anticipated to launch in San Diego until Q3/Q4 of 2020, one option is to expand Rebate Now to another air district with an existing CC4A program. This would enable evaluation of whether the combined point-of-purchase incentives provide a more effective incentive to priority populations. It would also facilitate a comparative analysis to San Diego, which could further inform future Rebate Now program design considerations.

[5] Tal, G. and Brown, A. Credits and Rebates Play a Key Role in Buiding Consumer Market for Cleaner Electric Vehicles. Greenlight Blog. Available: https://its.ucdavis.edu/wp-content/uploads/Credits-and-Rebates-Gil-Tal.pdf

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