

DOCKETED	
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Comment Received From: It's Electric, Inc.
Submitted On: 9/12/2025
Docket Number: 22-EVI-02

Comments from It's Electric re Communities in Charge Eligibility Requirements

Please see attached.

Additional submitted attachment is included below.



September 12, 2025

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: It's Electric Comments on CALSTART Communities In Charge EV Infrastructure Incentives (Docket 22-EVI-02)

Dear California Energy Commission,

It's Electric, Inc. ("It's Electric") is an electric vehicle (EV) charging station owner-operator (CSO), purpose-built for cities, with a mission to unlock access to clean vehicles for all urban drivers. We are deployed on a pilot basis in San Francisco, with contracts in hand to deploy in Alameda and Los Angeles. Millions of drivers lack home or private garages and cannot transition to electric vehicles due to the lack of on-street charging. It's Electric accelerates the adoption of EVs with its scalable and simple curbside charging solution, ensuring that every community has access to clean, sustainable transportation options – all at no cost to our city partners.

We commend the California Energy Commission and CALSTART for their leadership in advancing EV infrastructure and ensuring equitable access to clean mobility. We are concerned, however, that current eligibility requirements, particularly the **minimum of four ports per project site** requirement and rebate eligibility **purchasing requirements**, unintentionally limit participation by curbside charging providers and constrain the deployment of infrastructure in the very communities that need it most. This limitation is at odds with the [Equitable EV Charging Act](#), which requires municipalities to permit curbside charging when feasible, and finds that "ensuring access to electric vehicle charging stations, including curbside charging stations, is a matter of statewide concern."

While we recognize that the four-port minimum is consistent with National Electric Vehicle Infrastructure (NEVI) guidelines, those requirements were designed to establish minimum standards for highway corridor, off-street, and fast-charging contexts. By contrast, curbside charging operates in a fundamentally different environment, where success depends on community integration, urban density, and sensitivity to local parking dynamics. In neighborhood settings, installing four curbside ports at a single curbside site may not be possible. Even if it were possible, it may not be advisable, given that curbside EVSE often faces pushback for "taking away" parking spaces. Because of this, It's Electric often commits to not deploying more than two charging ports per block, to ensure that we don't provoke unnecessary backlash.

Curbside charging must be treated as a complementary infrastructure strategy alongside corridor and lot-based deployments in order for California to meet its ambitious ZEV adoption and climate goals. Funding programs should therefore reflect the unique needs of this model.

We respectfully request that the Commission and CALSTART consider refinements to future funding rounds to ensure eligibility pathways for curbside deployment, including:

1. Adjusting or **waiving minimum port-per-site requirements for curbside projects**, and
2. **Recognizing per-block or per-neighborhood deployment strategies** as a valid unit of measurement, rather than single-site clustering.

Regarding the rebate eligibility purchasing requirements, the Communities in Charge incentives are currently structured to require applicants to receive approval before purchasing equipment to qualify for the "rebate." As a charging station owner/operator, It's Electric does not "purchase" EVSE hardware; rather, we work with our manufacturing partner Gyre9 to submit production orders and fulfill deployment needs on a rolling basis as our sites are confirmed. Given that our model ensures equipment is only manufactured to fulfill active projects (not stockpiled or pre-purchased) we trust this satisfies the spirit of the eligibility requirement. We recommended that the **CEC clarify the program guidelines to explicitly include business models such as charging station owners/operators.**

We would welcome the opportunity to collaborate with the Commission and CALSTART to refine the Communities in Charge program design if CEC approves another funding wave, so that California's investments in EV infrastructure can reach all communities equitably, including the millions of urban residents who rely on curbside parking.

Thank you for your continued leadership, and we look forward to supporting California's mission of ensuring clean transportation access for all.

Sincerely,



Shannon Dulaney
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