

DOCKETED

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Comments on CTP Update Plan

Additional submitted attachment is included below.

November 7, 2025

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket No. 25-ALT-01 – 2025-2026 Investment Plan Update for the Clean Transportation Program

Introduction

EVgo appreciates the opportunity to submit comments on the 2025-2026 Draft Zero-Emission Vehicle Infrastructure Plan (ZIP). As one of the nation's largest public fast charging providers, EVgo shares the CEC's vision for a best in class customer experience for electric vehicle (EV) drivers and recognizes that a reliable, widespread EV charging network is crucial for scaling EV adoption needed to help achieve California's equity, clean energy, decarbonization, and air quality goals.

The ZIP provides an important roadmap for the execution of California's policy goals, and EVgo commends the CEC's leadership in accelerating EV adoption through a successful portfolio of EV charging programs. To ensure that the ZIP positions California for success and accurately reflects market conditions, EVgo makes the following recommendations:

1. Establish durable, predictable, and transparent funding cycles that meet CEC-funded charger deployment targets and create a more stable business environment for EV charger deployment;
2. Extend the current CALeVIP funding window through July and provide additional funding to provide certainty in the short term; and
3. Allocate more funding toward block grants, as opposed to Grant Funding Opportunities (GFOs) to deploy infrastructure at the scale needed to meet state goals;

Establish durable, predictable, and transparent funding cycles that meet CEC-funded charger deployment targets and create a more stable business environment for EV charger deployment

EVgo understands that fluctuations in California's annual budget cycles can create uncertainty around the level of funding the CEC has available to support its portfolio of EV charging programs. The greatest challenge facing CALeVIP today is the need for clarity on 2026 funding windows and predictable cycles for future years. DCFC projects operate on 18–24-month

development cycles, and potential CALeVIP applicants are finalizing their 2026 build plans now. We applaud the Commission's proactive work to provide early notice of the current Fast Charge California Project and urge similar swift action for 2026.

Going forward, a simple, predictable, and durable cycle of future solicitations for the CEC's EV charging funding initiatives – especially block grants – would support more efficient capital planning and submission of high-quality applications that meet the CEC's specifications as well as state infrastructure needs through 2030. Moreover, transparent scheduling creates a more stable business environment for California's growing EV economy and will lead to more consistent deployments of charging infrastructure as envisioned in 2025-2030 EV charging infrastructure forecasts in the ZIP, versus creating a "stop and start" development cycles due to lack of longer term certainty on CEC's programs.

Other states already follow this practice of longer-term certainty and predictability. For example, Colorado Energy Office's *Charge Ahead Colorado* EV charging grant program provides three standard application funding rounds annually in January, May, and September.¹ Continued, predictable funding is essential to build on this progress and preserve California's leadership in clean transportation.

Extend the current CALeVIP funding window and increase available funding to continue through July to provide certainty in the short term.

Before the end of 2025, we recommend the CEC further extend its current Fast Charge California Project, including providing additional funding (and adjusting program caps accordingly), until July. This action would continue the momentum of the existing funding round while the CEC develops and announces subsequent rounds for 2026. This would give a key signal for developers to accelerate deployments, whereas the current uncertainty could undermine projects early in development.

Allocate more funding toward block grants, as opposed to GFOs, to deploy infrastructure more expeditiously and at the scale needed to meet state goals

EVgo recommends that the CEC direct a greater share of funding toward block grants that are better designed to deploy charging infrastructure at the scale that California's EV goals demand. The 2025-2026 Update notes that while the CEC has primarily used targeted solicitations to award funding, block grants are also a common mechanism.² However, as the

¹ <https://energyoffice.colorado.gov/charge-ahead-colorado>

² 2025-2026 Investment Plan Update for the Clean Transportation Plan, pp. 14-15, October 8, 2025.

Update highlights, block grants, such as CALeVIP and Communities in Charge, have been funded at more than twice the amount of the targeted solicitations.³ EVgo recommends that the CEC direct a greater share of funding to block grant programs that can be quickly and consistently awarded. For example, whereas GFOs like FAST 2.0 may require at least two quarters between application submission and agreement execution with the CEC⁴, rolling block grant solicitations like CALeVIP 2.0 will notify applicants of their funding status within days of submission and allow applicants to incur costs at risk.⁵ The core design principles and program implementation of CALeVIP are often referenced as the gold standard in nationwide discussions and federal programs due to the speed with which CALeVIP projects are approved, funded, and deployed.

While certain market segments may benefit from more targeted solicitations, including rural communities, the CEC should leverage its extensive experience implementing EV charging programs to rapidly scale charging in high demand segments. Of the DCFC segments that the CEC assessed in the ZIP, urban/metro fast charging is by far the largest in terms of both: i) overall ports needed, and ii) proposed CEC-funded ports – approximately 6,000 ports between 2025 and 2030.⁶ The magnitude of ports needed to meet 2030 demand in this segment demands an efficient, scalable funding mechanism, and EVgo maintains that block grants like CALeVIP 2.0 are best positioned to maximize CEC’s investments in fast charging infrastructure in most cases.

Conclusion

EVgo commends the CEC for developing the 2025-2026 Investment Plan Update for the Clean Transportation Plan and recognizes that the level of ambition in California’s transportation electrification goals requires efficient, innovative approaches to achieving a widespread and convenient EV charging network. By providing greater transparency around funding cycles, continuing the momentum of the Fast Charge California Project, and dedicating more funding toward scalable block grants, the CEC can enable the state to achieve these goals. EVgo looks forward to being a resource as the CEC executes the Investment Plan.

Respectfully submitted this 7th day of November 2025,

/s/ Renee Samson

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³ Id., Tables 2 and 3.

⁴ <https://www.energy.ca.gov/solicitations/2024-12/gfo-24-607-fast-20-fast-and-available-charging-all-californians>

⁵ <https://calevip.org/sites/default/files/docs/golden-state-priority-project-north-south/gssp2-implementation-manual.pdf>

⁶ ZIP at 38-40. <https://www.energy.ca.gov/sites/default/files/2025-01/CEC-600-2025-002.pdf>

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