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Peninsula Clean Energy Authority Comments on Draft 2025-2026 Investment Plan Update for the CTP

Additional submitted attachment is included below.

November 3, 2025

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Submitted online at https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=25-ALT-01

Docket No. 24-ALT-01

RE: Peninsula Clean Energy Authority Comments on Draft 2025-2026 Investment Plan Update for the Clean Transportation Program – CEC EV Charging Programs Must Encourage Right-Sized EV Charging to Scale Results

Dear Commissioners and Staff,

Peninsula Clean Energy Authority (PCE), the not-for-profit Community Choice Aggregation (CCA) program for San Mateo County and the city of Los Banos, appreciates the opportunity to provide comments to the California Energy Commission (CEC) in the Draft 2025-2026 Investment Plan for the Clean Transportation Program (CTP).

PCE urges the CEC to allocate a greater share of incentives to electric vehicle (EV) charging solutions that are affordable, rapidly scalable, and appropriately matched to drivers' needs. As the state faces budget constraints, prioritizing lower-cost charging will allow public funds to support a larger number of installations and expand EV charging access. In addition, CEC should examine how the design of programs funded by the Clean Transportation Program may inadvertently encourage applicants to upsize their projects, resulting in higher project costs borne by the program. Upsized projects also lead to affordability challenges as they greater impacts on the grid resulting in higher costs borne by electric ratepayers.

PCE's evidence-based EV charging philosophy is based on "right-sizing" charging equipment for actual EV driver needs. Right-sizing actively avoids unnecessary upsizing of charging projects in order to reduce project costs and install more EV charging within limited budgets to expand charging access. This means that we can help the community provide more charging access, at a lower cost per charging port, while simultaneously mitigating or completely avoiding grid and service capacity upgrades. PCE's self-funded EV Ready Program has led to the installation of over 2,000 EV chargers in our service territory, two-thirds of

which have been installed at multi-family properties such as apartments and condominiums.[1] Some of these multi-family EV charging projects rank among the largest completed in California. As further detailed below, participants in PCE's EV Ready Program have been installing Level 1 chargers at an average cost of about $2,500, several times less expensive than comparable programs that rely primarily on Level 2 chargers to support light duty and multi-family EV charging.

Recommendations

To advance equitable and cost-effective EV charging, especially under current budget conditions, PCE recommends that the CEC's CTP Program:

1. Prioritize right-sized charging options, including Level 1 and other low-cost solutions, for multi-family sites and other long-dwell use cases.
2. Adjust incentive structures to discourage unnecessary upsizing of charging projects, ensure more cost-effective deployment of program funding, and avoid unnecessary impacts to the electric grid.
3. Encourage technical assistance that helps property owners design projects that minimize electrical upgrades while maximizing installed charger counts.
4. Evaluate Level 1 and Level 2 cost-per-outlet and cost-per-site metrics in program evaluations to strengthen program performance.

California Is Not on Track to Meet EV Charging Targets on Time

California has made substantial progress in expanding EV charging infrastructure in part due to the efforts of various CEC programs. However, California is not on pace to reach the goal of the 1.1 million EV chargers needed by 2030. According to the CEC's Zero-Emission Vehicle (ZEV) dashboard, approximately 200,000 chargers have been installed, which is about 20 percent of the 2030 target.[2] To meet the goal, roughly 200,000 new chargers would need to be installed each year for the next four years.

Without a course correction, California risks falling short of the infrastructure needed to support the Governor's Executive Order to phase out new gasoline vehicle sales by 2035.[3] This shortfall would slow the transition to zero-emission transportation and delay critical emissions reductions needed to mitigate catastrophic climate change. The CTP must therefore focus on strategies that enable faster, more cost-effective charging deployment.

EV Charging at Multi-Family Housing Has Been Particularly Challenging

Deploying EV charging at scale at multi-family housing is essential to ensure equitable access to clean transportation. This requires installing EV charging where multi-family residents live to provide certainty that

[1] "EV Ready Program." Peninsula Clean Energy. https://www.peninsulacleanenergy.com/business/rebates-offers-business/ev-ready-program/

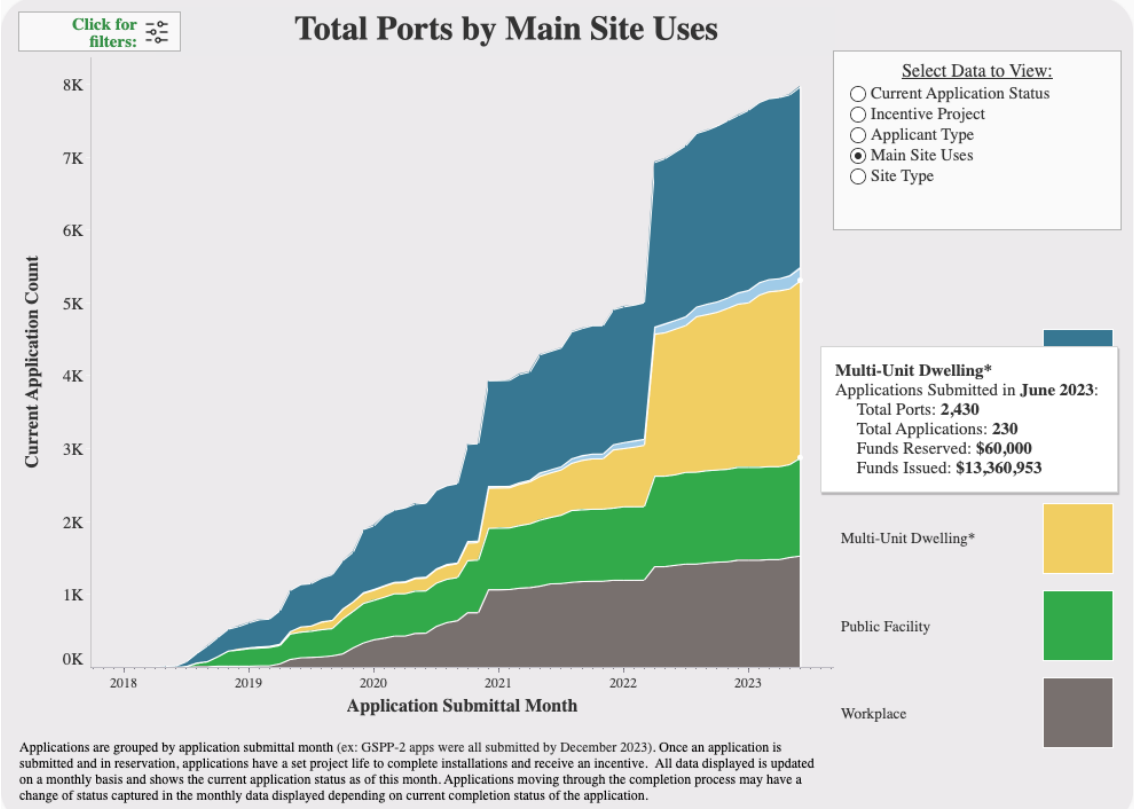
[2] "Electric Vehicle Charging Infrastructure Statistics." *California Energy Commission, Energy Almanac: Zero-Emission Vehicle and Infrastructure Statistics Collection.* https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics-collection/electric. Accessed November 4, 2025.

[3] "Executive Order N-79-20." Office of Governor Gavin Newsom. https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf.

they will have charging access as soon as they need it. Unfortunately, multi-family residents remain underserved by existing CTP programs, in part because of program requirements. The CALeVIP program, a major light-duty EV charging program funded by the CTP, has delivered only 2,400 EV chargers at multi-family properties across the entire state over the past five years, at a cost of over $13 million in incentives.[4]

PCE strongly supports the CEC's recent decision to include Level 1 charging in the Communities in Charge program focused on multi-family housing. The Communities in Charge program also allowed incentives for chargers installed in assigned parking spaces. PCE believes these program design decisions are a step in the right direction towards encouraging EV charging solutions that meet drivers' needs without undue project costs and grid impacts. However, key refinements are needed to fully realize the scalability and cost-savings potential of Level 1 charging.

Table 1: CALeVIP Rebate Statistics, Only 2,400 EV Chargers Installed at Multi-Unit Dwellings Across the State (Source: https://calevip.org/rebate-statistics)



The Value of Right-Sized Level 1 Charging

PCE's experience shows that right-sized Level 1 charging can deliver far more charging access per dollar spent than traditional approaches. In PCE's EV Ready Program, the average cost to install a Level 1 outlet at a multi-family property is about $2,500 per port, several times more affordable than a Level 2 charger.

[4] "Rebate Statistics." *California Electric Vehicle Infrastructure Project (CALeVIP).* https://calevip.org/rebate-statistics. Accessed November 4, 2025.

This cost difference allows the installation of four times as many charging ports for the same level of investment.

PCE's EV Ready program promotes right-sizing using Level 1 charging through the use of free technical assistance and incentive design. For example, the Program can cover 100% of the project costs for Level 1 installations but requires a 25 percent cost share for Level 2 projects. This encourages property owners to pursue Level 1 charging projects to meet their residents' driving needs, rather than defaulting to the more premium Level 2 option that would result in higher per-port project costs. Other charging incentive programs have begun adopting this design, as demonstrated in the Tables 2 and 3 below.

Table 2: PCE "EV Ready" Multi-Family EV Charging Incentives Overview[5]

	Measure Type	Port Incentive	Applicable Cap[1]
Existing Building Multifamily dwelling	L1 or L2 outlet	$2,500	No cap
	L2 charging station port	$4,500	Up to 75% of project cost, maximum $135,000 per property
	Main panel upgrade[2]	$5,000	Up to $5,000 per property
Existing Building Affordable housing multifamily dwelling	L1 or L2 outlet	$3,000	No cap
	L2 charging station port	$5,500	Up to 100% of project cost; maximum $135,000 per property
	Main panel upgrade[2]	$5,000	Up to $5,000 per property

Table 3: CleanPowerSF (San Francisco) "EV Charge SF"[6]

EV Charge SF Incentives for Existing Buildings

Property Type	EV Charging Equipment[1]	Incentive per Stall	Incentive Cap for Installed Equipment
Market Rate Multifamily (5+ units)	L2 EV Charger	**$4,500**	Up to 75% of project cost
	L1 or L2 EV Outlet	**$2,000**	Up to 100% of project cost
	Conduit for the Future	**$250**	
100% Affordable Multifamily	L2 EV Charger	**$5,400**	Up to 100% of project cost
	L1 or L2 EV Outlet	**$2,400**	
	Conduit for the Future	**$300**	
Non-Residential	L2 EV Charger	**$4,500**	Up to 75% of project cost
	L1 or L2 EV Outlet	**$2,000**	Up to 100% of project cost
	Conduit for the Future	**$250**	
All	Direct Wiring Option[2]	**$500**	
	Power Sharing Option[2]	**$250**	

[1] Only one EV Charge SF Program incentive per vehicle stall, except for Direct Wiring and Power Sharing incentives. Parking stalls with existing EV charging equipment or fully wired EV circuits or EV outlets are ineligible. Total annual incentives per building/project must not exceed $100,000, or $120,000 for Affordable Housing.

[2] Direct Wiring and Power Sharing incentives apply to either Level 2 EV Chargers or Level 1 or Level 2 EV Outlets.

[5] "EV Ready Program." Peninsula Clean Energy. https://www.peninsulacleanenergy.com/business/rebates-offers-business/ev-ready-program/

[6] "EV Charge SF Program Overview." *San Francisco Public Utilities Commission.* https://www.sfpuc.gov/sites/default/files/EVCSF%20Overview%20Flyer.pdf.

Multi-family property owners have responded positively to these efforts to guide them more cost-effective Level 1 charging through right-sized incentives and technical assistance. For instance, in September 2025, PCE and Bayview Condominiums celebrated the installation of 143 Level 1 outlets, a record retrofit project for multi-family housing. Using PCE's incentives that encourage right-sized charging solutions, the project was installed at zero out of pocket cost to the HOA. PCE expects to break this record again in early 2025 with a rental apartment project that is expected to install over 220 Level 1 outlets.

Figure 1: Ribbon cutting at Bayview Condominiums in Millbrae. Though PCE's EV Ready program, 143 Level 1EV chargers were installed, one in every parking space with no out-of-pocket cost to the property owner.

In contrast, the CEC Communities in Charge program provides up to $2,000 per Level 1 connector and up to *$8,500* per Level 2 connector with no cost share requirement.[7] The design of the program incentives encourage properties that were considering more cost-effective Level 1 chargers to instead pursue more expensive chargers, at the expense of overall cost-effectiveness and resulting in fewer chargers installed. Refining incentive levels would help ensure that CTP funding achieve the greatest possible impact.

[7] "Communities in Charge Incentive Manual Addendum: Funding Wave 4." *Communities in Charge, administered by CALSTART.* August 1, 2025. Pages 23-24. https://thecommunitiesincharge.org/wp-content/uploads/2025/08/CIC-IM-Funding-Wave-4-ADDENDUM-08.01.25-FINAL.pdf.

Conclusion

The next five years are critical to achieving California's target of the 1.1 million chargers by 2030. To meet this goal, particularly in a time when state budgets are limited, the Clean Transportation Program should emphasize lower-cost, rapidly scalable, right-sized EV charging solutions, to encourage properties to right-size their charging infrastructure. This is particularly for multi-family housing. These adjustments will enable CTP funding to support more projects, speed charging deployment, and ensure that California's transition to zero-emission transportation remains equitable and financially sustainable.

Sincerely,

/s/ Phillip Kobernick
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