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Adopt a Charger comments on CEC 2026-2027 Investment Plan

Additional submitted attachment is included below.

05/07/2026

Mabel Aceves
California Energy Commission
Docket 26-ALT-01
RE: 2026-2027 CLEAN TRANSPORTATION INVESTMENT PLAN

Adopt a Charger, Inc. (AAC) is a 501(c)3 non-profit organization, based in California that has facilitated the installation of over 600 EV charging installations in 15 states. Our mission is to raise awareness of plug-in electric vehicles (PEV) by broadening EV charging infrastructure. We specializes in inexpensive, noncomplex, **reliable** solutions, where drivers simply pull up and plug in. Our strength is electrifying difficult to commercialize locations like remote/rural areas, emerging markets, and destinations like State and National Parks that get seasonal usage.

AAC is grateful to have received funding for projects from the CEC ARFVTP program back in 2014, when we received a grant to install 65 EVSE at 12 California State Parks, almost all of which are still in service. In addition, we assisted the Mendocino Land Trust with their CEC grant proposal for EV charging at 10 California State Parks, which are also still operational. Prior to this grant, AAC worked with South Coast AQMD and LADWP to utilize CEC funding at Leo Carrillo State Beach, Malibu Creek State Park, Baldwin Hills Scenic Overlook, The Natural History Museum of LA County, the Getty Center, and the Getty Villa. AAC has also worked with the National Park Service to install EVSE at Yosemite, Point Reyes National Seashore, Crissy Field, Stinson Beach and Fort Mason. The AAC nonprofit model has proven to be a successful example of public/private partnerships, and all projects we have been involved in resulted in higher than average amounts of match funding.

AAC offers the following recommendations Electric Vehicle Charging Infrastructure Project Funding:

1. **Provide funding for non-networked charging stations, to keep costs down, increase the number of electric vehicle miles traveled (EVMT), and maximize the GHG benefit-cost score**.

Since 2014, the CEC and CARB have dramatically increased the requirements to receive CEC funding. Well intentioned as they are, the stringent funding requirements not only make the process much more expensive, but affect reliability of the service. When wi-fi and cell service are interrupted, or nonexistent, as in many remote an rural communities, network connections to the cloud to process payment and collect data for reporting requirements makes the projects overly burdensome. This low cost approach has proven successful, but it does not qualify for Cal EVIP funds. These projects also provide insight that should be considered when prioritizing reliability.

2. **Reconsider the cost implications of proposed program requirements.**

It is very important that the CEC remain focused on policies that incentivize the adoption of plug-in vehicles, bring down the cost per parking space, and increase GHG reduction.
In 2014, the average cost of installation and equipment at a State Park was $36,000. Estimates by the investor owned utilities in response to AB1082 CPUC filings have estimated the cost to be up to $165,000 per park. The CARB requirements make the cost even more prohibitive for difficult to commercialize charging locations, and emerging markets. The increased burden of satisfying ADA regulations, networking requirements, need for credit card readers, V to G, and standard weights & measurement compliance has dramatically increased the average cost per project. The burden of the escalating cost of infrastructure is passed on to the site host, making them less likely to install EVCS, or to the EV drivers which makes public charging 3-10 times more expensive than home charging.
Also important to consider is who bears the burden if the service should not meet expectations. There are a lot of instances where the EVSP is happy to cash the grant check, but when issues arise it is not their problem. When the 3G network was no longer offered, many site hosts were stuck with equipment that was non-operational, and forced to pay additional money in order to restore service.
Many key points were raised by the 2017 Rand Study, "Process and Outcome Evaluation of the Alternative and Renewable Fuel and Vehicle Technology Program" that support this viewpoint. A fuel related barrier identified by the Rand study was that ***"requirements for networked charging systems drives the cost up almost tenfold****." (page 90)* When charging is too expensive, driver's do not plug in, utilization plummets dramatically decreasing electric vehicle miles traveled (EVMT) and GHG reductions. We also miss an important opportunity for outreach and education.

3. **Eliminate Funding for Hydrogen Fueling Stations.**

The California Energy Commission has spent over $242 million since 2008 on hydrogen fueling stations, which resulted in 49 stations that are open, 8 that are nonoperational, and 35 that are in the planning stages. There are currently 14,128 hydrogen cars on the road, and that number is only expecting to increase to 16,210 by 2028. Compare that to 2,550,000 plug in vehicles on the road in California, which is expected to grow to over 3 million by 2028.
Hydrogen vehicles are simply not scaling quick enough to adequately address air quality issues or carbon reduction goals in the state. The technology is not a viable 50 state strategy, and with pressing climate concerns we need to support scalable approaches.

4. **Prioritize Investments in long dwell, time Level 2 charging for residents of Multi Family Dwellings.**

Industry efforts to promote DCFC hubs, **the most expensive charging scenario**, does not provide an equitable solution for renters. Our belief is that residents in apartments should have the same convenience as residents of single family housing, who wake up every morning to a full charge. Where renters do not have access to off street parking, curbside Level 2, or community charging at overnight surface lots, where cars are parked to midnight to 6:00 am, would make a demonstrative difference in communities of concern.
Plug-in hybrid vehicles (PHEV) help to eliminate barriers to adoption for people that do not have dedicated parking. PHEV for the most part do not allow for DCFC, and to increase EVMT they need access to Level 2 charging.

5. **Pricing transparency should include MSRP for equipment, plus networking and payment processing fees.**

I have observed the same equipment billed at different prices depending on the project location. Consumer protection is best promoted by easy to compare cost for charging infrastructure.

Thank you for considering my suggestions based on 24 years driving electric, and 16 years of working in EV charging infrastructure.

Kitty Adams Hoksbergen
Executive Director, Adopt A Charger, Inc.
kitty.adams@adoptacharger.org

- Rand: Process and Outcome Evaluation of the Alternative and Renewable Fuel and Vehicle Technology Program. By Lloyd Dixon, Tom LaTourrette, David A. Galvan, Charles A. Goldman, Nidhi Kalra, Christopher Nelson, Flavia Tsang, Paul S. Steinberg, James Lyons, Jerry Bowers, Bob Katin

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