DOCKETED	
Docket Number:	26-ALT-01
Project Title:	2026-2027 Investment Plan Update for the Clean Transportation Program
TN #:	270162
Document Title:	EVgo Comments - EVgo Comments on 2026-27 CTP Investment Plan Update
Description:	N/A
Filer:	System
Organization:	EVgo
Submitter Role:	Public
Submission Date:	5/22/2026 10:59:28 AM
Docketed Date:	5/22/2026

Comment Received From: EVgo
Submitted On: 5/22/2026
Docket Number: 26-ALT-01

EVgo Comments on 2026-27 CTP Investment Plan Update

Additional submitted attachment is included below.

May 22, 2026

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket No. 26-ALT-01 – 2026–2027 Investment Plan Update for the Clean Transportation Program

Introduction

EVgo appreciates the opportunity to submit comments on the draft staff report for the Clean Transportation Program (CTP) FY 2026-27 Investment Plan Update. As one of the nation's largest public fast charging providers, EVgo shares the CEC's vision that a reliable, widespread EV charging network is crucial for scaling electric vehicle (EV) adoption needed to help achieve California's equity, clean energy, decarbonization, and air quality goals.

The CTP Investment Plan provides an important roadmap for advancing California's transportation electrification goals, and EVgo commends the CEC's leadership in accelerating EV adoption through a diverse portfolio of EV charging programs. EVgo particularly appreciates the proposed funding allocation for light-duty EV charging infrastructure and the CEC's recognition that robust investment in direct current fast charging (DCFC) is essential to ensure that all Californians can realize the benefits of transportation electrification.

To ensure that the CTP Investment Plan positions California for success and accurately reflects market conditions, EVgo makes the following recommendations:

1. Establish durable, predictable, and transparent multi-year funding cycles that meet CEC-funded charger deployment targets and will lead to more market certainty and consistent EV charger deployment;
2. Allocate more funding toward block grants, as opposed to GFOs, to deploy infrastructure more expeditiously and at the scale needed to meet state goals; and
3. Maintain an emphasis on fast charger deployment to equitably accelerate progress on transportation electrification goals.

1. **Establish durable, predictable, and transparent multi-year funding cycles that meet CEC-funded charger deployment targets and will lead to more market certainty and consistent EV charger deployment, in line with national best practices.**

A simple, predictable, and durable multi-year cycle of future solicitations for the CEC's EV charging funding initiatives – especially block grants – would support more efficient capital planning and the submission of high-quality projects that meet CEC's specifications and state infrastructure needs through 2030. Other best-in-class state infrastructure programs provide this type of 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] A similar standardized, multi-year solicitation schedule would provide applicants with advance visibility into when application windows will open and how often solicitations will occur.

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. Nevertheless, a published multi-year solicitation schedule alone would give applicants enough certainty to plan needed to plan and develop projects, while reducing the stop-and-start deployment cycles that result from uncertainty around future funding opportunities.

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

The 2026-2027 Update notes that, while the CEC has primarily used targeted solicitations to award funding, block grants are also a common mechanism.[2] EVgo recommends that the CEC direct a greater share of funding to block grant programs, which support more rapid deployment. For example, grant funding opportunities (GFOs) like FAST 2.0 may require at least six months between application submission and agreement execution with the CEC,[3] with the projects unlikely to energize for at least another year due to design and construction. In contrast, rolling block grant solicitations like CALeVIP 2.0 will notify applicants of their funding status within days of submission and allow applicants to incur

---

[1] Charge Ahead Colorado EV Charging Grant, https://energyoffice.colorado.gov/charge-ahead-colorado.
[2] 2026-2027 Investment Plan Update for Clean Transportation Program Staff Draft (April 2026), https://efiling.energy.ca.gov/GetDocument.aspx?tn=269552&DocumentContentId=106643 at 11.
[3] GFO-24-607 - FAST 2.0 - Fast and Available Charging for All Californians, https://www.energy.ca.gov/solicitations/2024-12/gfo-24-607-fast-20-fast-and-available-charging-all-californians.

costs at risk,[4] enabling Tier 1 projects to energize as early as one to three months from program opening. The core design principles and program implementation of CALeVIP are widely viewed as a leading model 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, 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 its Zero-Emission Vehicle Infrastructure Plan, 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.[5] 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.

3. **Maintain an emphasis on fast charger deployment to equitably accelerate progress on transportation electrification goals.**

EVgo supports the CEC's emphasis on DCFC deployment, especially in areas lacking existing public fast charging or in areas where private investment alone is unlikely to meet demand. As noted in CEC's Electric Vehicle Charging Infrastructure Assessment,[6] DCFC infrastructure remains a critical component of California's efforts to support EVs and serve a variety of use cases, including:

- *EV charging access for multi-family housing (MFH) residents*: DCFC infrastructure is critical for enhancing equity and accessibility for MFH residents that drive EVs. According to a study by the UCLA Luskin Center for Innovation, a plurality of MFH residents report using public DCFC as their primary charging method, and the majority of MFH residents reported their primary charging location is outside the home.[7] The study also found that MFH residents that used public fast chargers

[4] Implementation Manual for Fast Charge California Project 1 (March 6, 2026), https://calevip.org/sites/default/files/docs/fast-charge-california-project/FCCP1_Implementation_Manual_FINAL.pdf.
[5] *2024 Zero-Emission Vehicle Infrastructure Plan: Deployment Strategy 2025 to 2030*, California Energy Commission Staff Report, January 2025, https://www.energy.ca.gov/sites/default/files/2025-01/CEC-600-2025-002.pdf at 38-40.
[6] Electric Vehicle Charging Infrastructure Assessment - AB 2127, https://www.energy.ca.gov/data-reports/reports/electric-vehicle-charging-infrastructure-assessment-ab-2127.
[7] DeShazo and Di Filippo, *Evaluating Multi-Unit Resident Charging Behavior at Direct Current Fast Chargers*, UCLA Luskin Center for Innovation, February 2021. Available at: https://innovation.luskin.ucla.edu/wp-

charged more frequently and used more energy on average than their non-MFH counterparts.[8] In other words, whereas many early EV adopters could primarily rely on home charging for their charging needs, developing an EV market inclusive of all Californians requires the deployment of convenient public charging solutions that can equitably serve a growing percentage of EV drivers without dedicated home charging access.

- *Electrification of ride-hailing services*: Convenient public fast charging is critical for the electrification of high-mileage ride-hailing fleets, particularly in urban metro areas. CARB's Clean Miles Standard requires platforms like Uber and Lyft to achieve fully zero-emission rides by 2030.[6]
- *Intercity travel*: DCFC plays an instrumental role in supporting intercity EV travel along highway corridors and fostering greater consumer confidence in EVs.

Continuing to support investments in fast chargers through large-scale, efficient solicitations like CALeVIP will enable the CEC to expand access to EV charging in all communities across the state.

Conclusion

EVgo thanks the CEC for initiating the CTP Investment Plan Update and recognizes that California's transportation electrification goals require efficient, innovative approaches to achieving a widespread and convenient EV charging network. By improving funding cycle consistency and transparency, directing more funding toward scalable block grants, and maintaining support for fast charger deployment, the CEC can enable the state to achieve these goals. EVgo looks forward to serving as a resource as the CEC implements the CTP Investment Plan.

Respectfully submitted this 22nd day of May 2026,

Katelyn Lee
Manager, Market Development and Public Policy
EVgo
1661 E. Franklin Ave.
El Segundo, CA 90245
Tel: 213.500.9092

content/uploads/2021/03/Evaluating-Multi-Unit-Resident-Charging-Behavior-at-Direct-Charging-Behavior-at-Direct-Current-Fast-ChargersCurrent-Fast-Chargers.pdf at 1.

[8] *Id.*

E-mail: katelyn.lee@evgo.com