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Peninsula Clean Energy Comments on Draft 26-27 Investment Plan Update for the CleanTransportation Program â€“ EV Charging Programs

Additional submitted attachment is included below.

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Docket No. 26-ALT-01

RE: Peninsula Clean Energy Comments on Draft 26-27 Investment Plan Update for the Clean Transportation Program – EV Charging Programs Must Encourage Right-Sizing 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) on the Draft 2026-2027 Investment Plan Update for the Clean Transportation Program (CTP).

PCE appreciates the CEC's proposed allocation of $48 million in Fiscal Year 2026-2027 for light-duty charging infrastructure through the CTP, including the stated focus on at-home and near-home charging at single-family and multi-family residences. PCE also recognizes and strongly supports the important changes CEC staff made in Communities in Charge Funding Wave 4, a CTP-funded program, to include Level 1 EV charging eligibility and allow EVSE in residential assigned parking spaces. These program design changes were responsive to stakeholder feedback, including recommendations informed by PCE's multi-family charging deployment experience, and are essential to enabling more scalable, affordable, and equitable charging access.

The addition of Level 1 to Communities in Charge was a meaningful policy improvement, and PCE encourages the CEC to build on that progress. As implementation of the CIC evolves, CEC-funded program requirements, incentive structures, and evaluation metrics should consistently support right-sized charging solutions that maximize charging access while minimizing unnecessary infrastructure costs. As the state faces continued budget constraints, maximizing charging access per public dollar should remain a central program objective.

PCE's evidence-based EV charging retrofit philosophy is based on "right-sizing" charging equipment for actual EV driver needs. Right-sizing focuses on average charging needs and actively

avoids unnecessary upsizing of charging projects to reduce project costs and install more charging within limited budgets. This means that PCE's EV charging programs deliver more charging access, at a lower cost per charging port, while simultaneously mitigating or completely avoiding grid and service capacity upsizing.

PCE's self-funded EV Ready Program[1] has led to the installation of over 2,500 EV chargers in our service territory, two-thirds of which have been installed at multi-family properties such as apartments and condominiums. In PCE's EV Ready Program, Level 1 retrofit installations at multi-family properties have averaged about $2,700 per port, an order of magnitude less expensive than installing conventional Level 2 chargers as done under comparable light-duty and multi-family EV charging programs. PCE completed one such project in 2025 that delivered 143 Level 1 smart outlets, one for each residence, a record breaker for a multi-family retrofit EV charging project.[2] PCE expects to complete additional projects at an even greater scale in 2026. To date, the program has funded the installation of over 1,000 Level 1 or low-power Level 2 smart outlets with approximately another 1,000 in progress now.

Recommendations

To advance equitable and cost-effective EV charging, PCE recommends that the CEC's Clean Transportation 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, across all applicable CEC funding programs, to maximize access to EV charging.

2. Restore explicit language supporting Level 1 charging in long-dwell locations. The 2025-2026 Investment Plan Update identified "Level 1 and Level 2 charging in locations with longer vehicle dwell times, including at-home charging with specific focus on multifamily residences." The 2026-2027 draft uses broader language referring to at-home and near-home charging, including at single and multi-family residences. PCE recommends that the CEC restore explicit reference to Level 1 charging solutions in long-dwell settings.

3. Ensure CEC-funded program requirements are performance-based and reflect market availability and avoid overly prescriptive rules that exclude cost-effective charging solutions.

4. Adjust incentive structures to discourage unnecessary upsizing of charging projects. For multi-family programs, incentive design should encourage property owners to install the greatest number of chargers that meet residents' needs. Incentive structures should avoid steering applicants toward more expensive charging equipment by covering a larger proportion of those project costs. Other CTP programs, such as fleets, should similarly avoid mandating applicants to pursue higher-power charging through program rules that require

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

[2] "Local Leaders Celebrate Groundbreaking Bayview Condos EV Charging Installation." Peninsula Clean Energy https://www.peninsulacleanenergy.com/news-releases/local-leaders-celebrate-groundbreaking-bayview-condos-ev-charging-installation/

minimum power levels for fast charging.

5. Encourage technical assistance that helps guide property owners to maximize installed charger counts while minimizing the need to upsize their electrical service.

6. Evaluate and compare Level 1 and Level 2 installations by the cost-per-outlet, cost-per-site, cost-per-resident-served, and service-upgrade-avoidance metrics in program evaluations.

EV Charging at Multi-Family Housing Requires Right-Sized Solutions

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 they will have charging access as soon as they need it. Unfortunately, multi-family residents remain underserved by existing charging programs. This is in part because program designs have often prioritized more expensive charging solutions that are difficult to scale across existing apartment and condominium properties.

Level 1 charging is particularly well suited for many multi-family housing sites because residents typically park overnight and have long dwell times. In these settings, the relevant goal is not always the fastest possible charging speed. The more important goal is convenient and reliable access to charging where residents already park. A lower-power, lower-cost, charging model in assigned parking spaces meets the majority of residents' daily driving needs, while enabling property owners to electrify many more spaces within the same project budget. In customer surveys, 85% of EV drivers with Level 1 charging say their needs are met, showing Level 1 is just as good for drivers as Level 2 charging.

PCE strongly supports the CEC's decision to include at-home and near-home charging in the proposed light-duty allocation. However, PCE recommends that the Investment Plan explicitly recognize that right-sized charging includes Level 1 and other lower-cost charging options matched to the specific use case.

Multi-family property owners have responded positively to efforts to guide them to 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. The project, which provided charging access to every parking space, was fully installed for less than $300,000. These costs were fully covered by PCE's incentives. PCE expects to break this record again in 2026 with a rental apartment project that is expected to install over 200 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.

Level 1 charging furthermore provides significant grid benefits. Level 2 charging results in concentrating higher peak charging into a narrow window typically at the end of commutes, right in the peak period best avoided. In theory, Level 2 charging could be shifted through enrollment in managed charging programs or systems. However, recent research concludes such systems are often ineffective.[3,4] Level 1 charging benefits the grid by providing uniform, low and flat load spread over many hours, mostly outside peak periods. These benefits are guaranteed for all Level 1 users without expensive systems or programs.

CEC's REACH Program Shows the Importance of Preserving Lower-Cost Charging Options

PCE conducted a review of awarded project budgets from the CEC-funded Reliable, Equitable, and Accessible Charging for Multifamily Housing (REACH) 2.0 and REACH 3.0 programs with data provided by the CEC. This analysis indicated that program design has a significant effect on cost-effectiveness. REACH is a critical component of the Clean Transportation Program because it targets hard-to-serve communities and use cases, including multifamily housing residents who often lack access to reliable home charging.

[3] "If You Built It, They May Not Come: Willingness to Particpiate In Managed EV Charging." National Bureau of Economic Research. https://www.peninsulacleanenergy.com/pce-resources/uc-davis-paper-on-pce-ev-managed-charging-experiment/

[4] "PCE EV Managed Charging Pilot Results." Peninsula Clean Energy https://www.peninsulacleanenergy.com/pce-resources/pce-ev-managed-charging-pilot-results/

In REACH 2.0[5], EV charging projects using Level 1 smart outlets had an average proposed award of approximately $5,500 per space electrified. In contrast, projects using L2 charging stations had an average proposed award of $11,500 per space, over 2X the cost of a smart outlet. In REACH 3.0, after smart outlets were no longer eligible and projects were limited to hardwired charging stations, awarded projects similarly had an average proposed award of $11,500 per space. These results suggest that excluding lower-cost charging approaches like Level 1 smart outlets can materially increase per-port project costs.

The data suggests this policy shift had a substantial effect. Relative to REACH 2.0 smart-outlet projects, REACH 3.0 projects were associated with markedly higher costs per port and produced significantly less charging access per dollar invested. Excluding lower-cost charging solutions reduced the level of charging access that multifamily properties could otherwise have provided.

These findings are directly relevant to the CEC's Clean Transportation Program investment strategy. For multifamily housing and other long-dwell applications, lower-cost charging solutions, including smart outlets and other right-sized approaches, can expand access more quickly and at lower cost while also reducing unnecessary electrical upsizing. As the CEC evaluates future program design, it should ensure that eligibility requirements and incentive structures preserve cost-effective charging options that can maximize the number of Californian households served with limited state funding.

Communities in Charge Should Build on Its Level 1 Progress

PCE appreciates the CEC staff's decision to add Level 1 charging eligibility to Communities in Charge Funding Wave 4 and for allowing assigned parking spaces to be eligible where they serve residents of eligible multi-family housing. These were important changes because they align program design with how resident parking is typically managed in multi-family properties and how charging infrastructure can be deployed cost-effectively in those settings. Many apartment and condominium residents park in assigned spaces, and many of those vehicles remain parked for long enough for Level 1 charging to provide meaningful daily charging access at a much lower cost than higher-power alternatives.

PCE encourages the CEC to treat the addition of Level 1 as a foundation for a broader right-sized charging strategy across the CEC's light-duty charging programs. The Communities in Charge Implementation Manual[6] states that Funding Wave 4 was the first funding wave to provide incentives for Level 1 EVSE in addition to Level 2 EVSE, and that Funding Wave 4 provided incentives for EVSE in shared or assigned parking spaces serving residents of eligible multi-family housing. The CEC should build upon this progress by updating program descriptions in the FY 2026-2027

[5] https://www.energy.ca.gov/solicitations/2023-04/gfo-22-614-reliable-equitable-and-accessible-charging-multi-family-housing-20

[6] Project Implementation Manual & Addendum, Funding Wave 4. California Energy Commission. https://thecommunitiesincharge.org/wp-content/uploads/2025/08/CIC-IM-Funding-Wave-4-ADDENDUM-08.01.25-FINAL.pdf

Investment Plan ("Table 2: Recent Funding Opportunities for Light-Duty Charging") to reflect that Communities in Charge now supports both Level 1 and Level 2 charging.

At the same time, PCE recommends that the CEC assess the implementation of Level 1 eligibility in Communities in Charge to identify whether program rules inadvertently limited participation. For example, the Funding Wave 4 Implementation Manual required eligible Level 1 equipment to include a "single outlet Level 1 EVSE only." PCE believes this requirement may have inadvertently limited participation by otherwise viable Level 1 charging technologies currently available on the market.

If Level 1 participation in Communities in Charge Funding Wave 4 was lower than anticipated, PCE recommends that the CEC evaluate whether current program design requirements are unnecessarily limiting eligible projects or technologies before allocating additional funds through similar program structures. PCE appreciates the CEC's leadership in adding Level 1 eligibility. These recommendations are intended to help ensure that future program design fully realizes the policy objectives underlying that decision.

Incentive Design Should Not Push Properties Toward More Expensive Charging

PCE's EV Ready Program uses free technical assistance and incentive design to promote right-sizing. For example, PCE's EV Ready program can cover up to 100 percent of project costs for Level 1 installations, while Level 2 projects require a customer cost share. This encourages property owners to pursue Level 1 charging projects when Level 1 meets their residents' needs, rather than defaulting to a more expensive Level 2 option that would result in higher per-port project costs.

By contrast, Communities in Charge Funding Wave 4 provided up to $2,000 per Level 1 Smart Outlet and up to $8,500 per Level 2 Charging Port. This incentive structure can encourage properties that were considering more cost-effective Level 1 chargers to pursue more expensive Level 2 chargers instead. This reduces the project's overall cost-effectiveness and total charging access it delivers. In PCE's EV Ready program, multi-family property project costs have an average of $2,700 per Level 1 charger and $6,800 per Level 2 charger installed. Under the current CIC program incentives, multi-family property owners would still have to pay $700 out of pocket per Level 1 charger installed. But they can have 100% of their costs covered if they instead install Level 2 chargers. This encourages property owners to pursue more expensive charging solutions to have more costs covered by incentives. Refining incentive levels and cost-share requirements would help ensure CTP funding achieves the greatest possible impact.

Higher per-port costs mean fewer residents served within the same public budget. At multi-family housing, incentive structures that steer participants towards Level 2 charging can reduce the total number of charging opportunities, increase the likelihood of electrical upgrades, and raise long-term costs borne by programs, property owners, residents, and ratepayers. CEC programs should instead reward the outcomes the state needs most: more charging access, more residents served, lower per-port costs, and lower grid impacts.

Existing Multi-Family Housing Requires Dedicated Retrofit Strategies

PCE recognizes that updates to the California Green Building Standards Code will increase EV-ready infrastructure and installed Level 2 chargers in new or substantially retrofitted multi-family dwellings, hotels, and offices. These code updates are important. However, they do not solve the challenge of existing multi-family housing, where most multi-family residents already live and where parking, electrical capacity, ownership structures, and project costs remain significant barriers to EV charging deployment and EV adoption.

The CTP should therefore continue to prioritize retrofit strategies for existing multi-family housing. These strategies include technical assistance, simplified participation requirements, and incentives that encourage projects that maximize the resident charging access while minimizing costly utility service upsizing. technical assistance is particularly critical for multi-family property owners, many of which are not familiar with the technical aspects of EV charging and project design options. A well-designed technical assistance offering can properly guide these property owners through various project tradeoffs and options to ensure a cost-effective project.

In PCE's EV Ready program, free technical assistance typically leads to multi-family property owners to deploy roughly three times more EV charging than they originally requested. This is because technical assistance frequently educates property owners on the benefits of right-sized EV charging solutions and demonstrates that they can pursue significant more EV charging than they realized.

Program Evaluations Should Measure Charging Access and Cost-Effectiveness

PCE supports the CEC's effort to track program benefits beyond the location of funded projects, including whether infrastructure deployment serves low-income housing or multi-family housing units. PCE recommends that CEC further strengthen program evaluations by tracking:

- Cost per charging port or outlet;
- Cost per resident or household served;
- Number of assigned parking spaces electrified;
- Percentage of property residential units with access to dedicated charging;
- Percentage of projects that avoid utility service or panel upsizing;
- Incentive dollars per charging opportunity delivered;
- Level 1 and Level 2 cost-per-outlet and deployment-speed comparisons;
- Total project costs, including utility-side and customer-side infrastructure costs where available; and
- Program-level comparisons across eligible technology types, including smart outlets, Level 1 charging, Level 2 charging, and other right-sized approaches.

These metrics will help CEC evaluate whether funded programs are delivering equitable charging access in the most cost-effective manner. They will also help identify when eligibility rules or incentive structures are unintentionally increasing per-port costs and reducing charging access.

Conclusion

The next several years are critical to achieving California's ZEV goals. Meeting these goals, particularly at a time when state budgets are constrained, will require the Clean Transportation Program to prioritize lower-cost, rapidly scalable, right-sized EV charging solutions. This is particularly important for residents of existing multi-family housing.

PCE supports the proposed $48 million allocation for light-duty charging infrastructure in Fiscal Year 2026-2027 and the draft Investment Plan's focus on at-home and near-home charging. PCE also appreciates the CEC staff's decision to add Level 1 charging and assigned parking eligibility to Communities in Charge Funding Wave 4. These are important steps toward a more scalable and equitable charging strategy.

PCE urges the CEC to strengthen the final Investment Plan by explicitly prioritizing Level 1 and other right-sized charging solutions for appropriate long-dwell use cases and designing incentives that maximize charging access per public dollar.

These adjustments will enable CTP funding to support more projects, accelerate charging deployment, reduce unnecessary grid impacts, and ensure that California's transition to zero-emission transportation remains equitable and financially sustainable.

Sincerely,

/s/ Phillip Kobernick

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