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Peninsula Clean Energy Comments on CEC Communities in Charge Program, Missed Opportunity for Greater Access to EV Charging

Additional submitted attachment is included below.



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Docket No. 22-EVI-02

RE: Peninsula Clean Energy Authority Comments on CEC Communities in Charge Program, Missed Opportunity for Greater Access to EV Charging for Multi-Family Residents

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) regarding the Communities in Charge (CIC) program.

PCE appreciates and strongly supports the CEC's decision to add Level 1 electric vehicle (EV) charging and assigned parking eligibility to Communities in Charge Funding Wave 4. Level 1 EV charging has demonstrated to be a breakthrough technology for multi-family residents, providing significant cost savings¹, customer convenience², and grid benefits³.

However, overly restrictive implementation rules in the CIC program limited participation of Level 1 charging solutions and reduced the program's ability to deliver the greatest possible charging access for multi-family residents.

¹ Average Level 1 project costs are appx. \$2,700 per port in PCE's EV Ready program compared to appx. \$7,000 - \$10,000 per port for Level 2 projects in PCE and other programs.

² When asked how well their EV charger meets their needs in a customer survey, Level 1 users provided a score of 8.5 compared to 9.3 for Level 2 users, indicating very similar satisfaction.

³ Level 1 charging provides consistent low-power charging without the need to provide complex charge management programs, further detailed in these comments.

Introduction

CIC Funding Wave 4 made several key improvements. PCE believes the decision to focus Funding Wave 4 on multi-family housing and related sites reflects an acknowledgement that more needs to be done to expand EV charging access to Californians who reside in multi-family housing. Funding Wave 4 was also the first CIC funding wave to provide incentives for Level 1 EV charging.

As described further below, PCE's multi-family experience demonstrates the value of "right-sizing" EV charging investments based on drivers' typical energy needs, through Level 1 charging. These projects have yielded dramatically reduced installation costs, avoided service upsizing, and expanded EV charging access. PCE also strongly supports the decision to allow EV charging in assigned parking spaces, provided the space serves at least one resident of an eligible multi-family housing site. Taken together, these were important and necessary program design changes to improve access to charging for multi-family residents.

However, certain Funding Wave 4 requirements on Level 1 charging projects limited the promise of the design elements noted above. PCE is concerned that several prescriptive requirements were added without sufficient reflection of market availability or the specific deployment models that have successfully delivered record-breaking amounts of EV charging at multi-family housing. As a result, the program appears to have created avoidable barriers to Level 1 projects, the very projects that can often deliver the most charging access per public dollar at multi-family housing. Further, the incentive design structure in Funding Wave 4 encouraged applicants to pursue more expensive EV charging with fewer charging ports delivered for multi-family residents, an outcome that can be reversed with modest modifications in program incentives.

PCE urges the CEC and CIC program administrators to promptly revise Level 1 technology eligibility requirements and subsequently re-open or extend the Level 1 opportunity so that the \$5,000,000 set aside for Level 1 EV charging projects can be utilized. For future funding rounds, PCE also urges the CEC to revise incentive design to better support right-sized EV charging solutions, rather than inadvertently pushing applicants toward more expensive Level 2 projects that deliver fewer chargers for multi-family residents.

Recommendations

To ensure the CEC's Communities in Charge can scale affordable EV charging access at multi-family housing, PCE proposes the following recommendations:

1. Replace the prohibition on multiple outlets in a single Level 1 EVSE with minimum power requirements. The program should allow Level 1 products with multiple outlets, where each outlet can provide a minimum of 1.3 kW simultaneously, as provided by at least one Level 1 EVSE vendor, in a manner analogous to dual-port Level 2 EVSE.
2. Rebalance incentives to avoid encouraging unnecessary upsizing from Level 1 to Level 2. Communities in Charge currently offers up to \$2,000 per Level 1 Smart Outlet and up to \$8,500 per Level 2 Charging Port. This incentive structure can lead property owners to pursue more expensive Level 2 projects simply because the program covers a higher proportion of

those project costs, even when Level 1 charging is a more cost-effective option to meet residents' charging needs.

3. Establish maximum funding amounts based on funding levels rather than maximum number of charging ports. This would allow properties to install more EV charging with the same overall incentive caps, rather than restricting projects by port quantity.
4. Evaluate program success based on cost per charging port, cost per resident served, and total charging access delivered. These metrics would better reflect the value of right-sized EV charging in multi-family settings and California goals to expand access to EV charging.
5. Revise Level 1 GFCI requirements to allow equivalent code-compliant protection at the breaker or receptacle. The program should require GFCI protection consistent with the California Electrical Code.

Level 1 Charging Is Essential for Multifamily Housing

Deploying EV charging at multi-family housing is essential to ensure equitable access to clean transportation. Residents of apartments and condominiums often lack access to home charging, even though home charging is typically the most convenient and affordable charging option for EV drivers.

PCE's evidence-based EV charging philosophy is based on "right-sizing" charging equipment for actual driver needs. Right-sizing avoids unnecessary upsizing of charging projects in order to reduce project costs, mitigate or avoid service capacity upsizing, and install more charging within limited budgets. In PCE's EV Ready Program, Level 1 installations at multi-family properties have averaged about \$2,700 per port, several times less expensive than many Level 2 installations. This cost difference allows public funds to serve far more residents and parking spaces. In fact, multi-family properties in PCE's program typically triple the amount of EV charging installed from what they initially requested, after receiving technical assistance that includes Level 1 EV charging. 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.

Level 1 is particularly well suited to assigned parking at multi-family housing because residents typically park for long dwell times overnight. In these settings, the goal is not to maximize charging speed, but rather to provide convenient and reliable access to charging where residents already park. A lower-power, lower-cost, assigned-space charging model allows property owners to electrify substantially more parking spaces while still meeting typical daily charging needs. In customer surveys, 85% of EV drivers with Level 1 charging say their needs are met (compared to 93% with a Level 2 EV charger), showing Level 1 is just as good for drivers as Level 2 charging.

Multi-family property owners have responded positively to these 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 smart Level 1 outlets, a record retrofit project for multi-family housing, without needing to upsize the

utility electrical service.⁴ PCE expects to break this record again in summer 2026 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.

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, L2 charging could be shifted through enrollment in managed charging programs or systems. However, recent research concludes such systems are often ineffective.^{5,6} L1 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 L1 users without expensive systems or programs.

Restrictive Level 1 Technology Requirements Limited Participation

The Communities in Charge Implementation Manual (CIC Manual) requires eligible Level 1 equipment to meet various safety and compliance standards, as well as minimum power thresholds. It also states that a Level 1 EVSE may have one Smart Outlet and must not contain multiple ports or outlets in a single EVSE.⁷

The prohibition on multiple outlets in a single Level 1 EVSE appears to have excluded products and project designs that have been successfully deployed in the multi-family market,

⁴ <https://www.peninsulacleanenergy.com/news-releases/local-leaders-celebrate-groundbreaking-bayview-condos-ev-charging-installation/>

⁵ "If You Built It, They May Not Come: Willingness to Participate In Managed EV Charging." National Bureau of Economic Research. <https://www.peninsulacleanenergy.com/pce-resources/uc-davis-paper-on-pce-ev-managed-charging-experiment/>

⁶ "PCE EV Managed Charging Pilot Results." Peninsula Clean Energy <https://www.peninsulacleanenergy.com/pce-resources/pce-ev-managed-charging-pilot-results/>

⁷ Communities in Charge, Project Implementation Manual & Addendum Funding Wave 4

including some of the largest multi-family EV charging projects in the state. Rather than prohibit multiple outlets categorically, the program should establish more flexible requirements for minimum power levels that reflect the current state of the market. For instance, the CIC Manual could instead require that each outlet simultaneously provide the 1.3 kW minimum power levels already established in the program rules, similarly to how dual-port Level 2 charging is already allowed.

PCE understands that the CEC is revising the GFCI rule to allow for EV chargers that provide GFCI protection through a dedicated GFCI circuit breaker in compliance with the applicable California Electrical Code and local AHJ requirements. PCE supports this decision, which it expects will remove a significant barrier to participation for companies that provide Level 1 EV charging smart outlets.

These requirements appear to have had a major adverse impact. It is PCE's understanding that Funding Wave 4 received no applications for Level 1 projects. If confirmed, this should be treated as a market signal that the Level 1 implementation rules were not aligned with available products or project economics. This is a lost opportunity to deploy significant amounts of cost-effective EV charging for California's multi-family residents. The CEC made the important policy decision to include Level 1 charging, but the implementing requirements limited the ability of the market to respond.

Incentive Design Should Encourage Right-Sized Charging Solutions

PCE is also concerned that the current incentive structure may unintentionally encourage more expensive projects that deliver less charging access. CIC provides up to \$2,000 per Level 1 Smart Outlet and up to \$8,500 per Level 2 Charging Port, without a cost share requirement. While Level 2 charging has an important role in many use cases, this structure can make Level 2 appear more financially attractive to applicants even when Level 1 would be the more cost-effective and scalable solution for residents. 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 creates an incentive for CIC applicants to install more expensive chargers, at further incentive costs to the CEC.

This matters because higher per-port costs mean fewer residents served within the same public program budget. At multi-family housing, an incentive structure that over-incentivizes Level 2 charging can result in fewer total charging ports, greater electrical upgrade needs, and higher costs borne by programs, property owners, residents, and ratepayers. CIC should instead reward the outcomes the state needs most: more charging access, more residents served, lower cost per port, and lower grid impact.

PCE's EV Ready program promotes right-sizing through free technical assistance and incentive design. For example, the EV Ready 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 cost. Other

charging incentive programs, such as CleanPowerSF, have begun adopting this design, as demonstrated in the Tables 2 and 3 below.

Table 1: PCE “EV Ready” Multi-Family EV Charging Incentives Overview⁸

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

Table 2: CleanPowerSF (San Francisco) “EV Charge SF”⁹

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.

CIC Should Reward Projects That Provide Greater Access to EV Charging

Communities in Charge has a project maximum of 40 charging ports per site, resulting in a significant disparity in the total incentive funding available to projects. Under the current structure, properties may receive up to \$80,000 in base incentives for Level 1 charging projects, compared to \$340,000 in base incentives for Level 2 charging projects. Establishing project caps based on total

⁸ “EV Ready Program.” Peninsula Clean Energy. <https://www.peninsulacleanenergy.com/business/rebates-offers-business/ev-ready-program/>

⁹ “EV Charge SF Program Overview.” San Francisco Public Utilities Commission. <https://www.sfpuc.gov/sites/default/files/EVCSF%20Overview%20Flyer.pdf>.

project funding (e.g. maximum incentive amount of \$340,000 per site), rather than the number of charging ports, would allow properties to install up to 170 Level 1 chargers for the same maximum funding currently available for projects installing only 40 Level 2 chargers. This approach could encourage sites to install 4X more charging ports with the same overall program budget. A funding-based cap rather than a cap on charger quantity would allow the CEC to retain budgetary controls while better supporting large-scale EV charging projects at multi-family properties.

Conclusion

PCE appreciates the CEC's leadership in adding Level 1 charging and assigned parking to Communities in Charge. These decisions are directionally correct and can help unlock a much more scalable pathway for EV charging at multi-family housing. But to achieve the intended results, the program must ensure that Level 1 requirements reflect market availability, code-compliant design practices, and proven deployment models.

PCE urges the CEC to revise the Level 1 equipment requirements immediately so that the \$5 million set aside for Level 1 can be utilized. This could provide approximately 2,500 Level 1 chargers to multi-family residents. Future funding waves should rebalance incentives so that public funds support the greatest possible amount of charging access. These changes will help Communities in Charge deliver more projects, serve more multi-family residents, and ensure California's transition to zero-emission transportation remains equitable and financially sustainable.

Sincerely,

/s/ Phillip Kobernick

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