

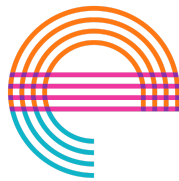
DOCKETED

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It's Electric Supplemental Comments on Communities In Charge EV Infrastructure Incentives

Additional submitted attachment is included below.



September 30, 2026

California Energy Commission
715 P Street
Sacramento, CA 95814

**Re: It's Electric Supplemental Comments on Communities In Charge EV Infrastructure Incentives
(Docket 22-EVI-02)**

Dear California Energy Commission,

It's Electric, Inc. ("It's Electric") is an electric vehicle (EV) charging station owner-operator purpose-built for cities, with a mission to unlock access to clean vehicles for all urban drivers. We write today to build on our September 12, 2025 comments with additional detail from our experience applying to Funding Wave 4 of the Communities In Charge (CIC) program, in the hope that it informs the design of future funding waves.

We are incredibly grateful for the Commission's leadership. Millions of Californians who live in multifamily housing lack home charging and depend on curbside charging to make the switch to EVs. CIC is one of the most important vehicles for serving them, and we want curbside EVSE providers to be able to participate fully. Our applications surfaced several requirements that, as written, are difficult or impossible for curbside projects to satisfy, even though curbside charging clearly serves the multifamily residents the program is meant to reach.

1. Property deed requirement

Applicants were asked to submit a property deed for the project site. Curbside chargers are installed in the public right-of-way, where no deed exists that an applicant could provide. It is our understanding that applicants were scored negatively for not submitting one. Program staff had advised us that a charger within a one-eighth-mile walk of a multifamily property would count toward serving that property. It was therefore difficult to reconcile that guidance with a scoring criterion that penalized us for lacking a deed. We ask that future guidelines accept alternative documentation for curbside sites, such as a municipal agreement or encroachment or right-of-way permit, and that they not penalize applicants for the absence of a deed.

2. Building permit requirement

The guidelines contain language suggesting that a building permit is required. In most California municipalities, curbside chargers are not permitted through a building permit process, and many cities have no mechanism to issue one for right-of-way equipment. We ask the Commission to clarify what documentation satisfies the permitting requirement for curbside projects, and to recognize the encroachment, right-of-way, or public works permits that cities actually issue.

3. Four-port minimum

As we noted in our earlier comments, the four-port-per-site minimum is incompatible with curbside deployment. We would add two points. First, we understand that the CIC program is not funded with federal dollars, so we do not see why a standard drawn from federal highway

corridor charging requirements should govern community charging. Second, the Equitable EV Charging Act requires municipalities to permit curbside charging when feasible. A four-port minimum puts those same municipalities in a difficult position, because clustering four ports on a single block invites the community backlash the Act's implementation is meant to avoid. We ask that the minimum be waived or adjusted for curbside projects, as described in our prior comments.

4. Application structure

Because curbside chargers are dispersed across a city, our Wave 4 applications were divided across many small sites. We needed our municipal partners to sign 32 separate applications. This created a significant administrative burden for city staff and for us, with no corresponding benefit to the program. We ask the Commission to allow multiple curbside sites to be submitted as a single project, with a citywide or per-neighborhood project as the unit of application, and one municipal authorization covering all sites.

5. Community connections documentation

The implementation manual awards extra scoring points for applicants who submit documentation of community connections. We understand the rationale for this criterion in a conventional off-street multifamily housing deployment, where the applicant is expected to have an existing relationship with the property owner or manager and can point to letters of support, tenant outreach, or similar materials tied to that specific site.

That rationale does not carry over to curbside charging. Our relationship is with the city, not necessarily with individual property owners along the block where a charger is sited. A curbside charger is not always affiliated with any single building; it is public infrastructure sited in the right-of-way to serve whichever multifamily residents happen to live within walking distance. In a traditional direct-to-utility curbside deployment, we would have no occasion to form a documented relationship with those property owners, and in most cases we have no reason to contact them at all, since siting and community engagement for curbside projects are handled through the municipal permitting and outreach process, not through property-level agreements. In our building-connected deployments, we develop relationships with property owners and may be able to meet this requirement, but our building-connected curbside model is unique to It's Electric.

As written, the criterion effectively asks curbside applicants to produce documentation that does not exist for curbside business models, and penalizes us relative to site-based applicants for a difference in deployment model rather than a difference in community benefit. We ask that the Commission either accept a municipal partnership agreement, letter of support from the city, or other documents as the qualifying community connections documentation for curbside projects, or clarify that curbside applicants are scored on an alternative criterion that reflects how these projects are actually sited and supported. For example, we provided a list of multi-family housing buildings within a short walkshed of each of the chargers, but that was not accepted as documentation in Funding Wave 4.

Requests

In summary, we respectfully request that the Commission:

1. Accept alternatives to a property deed for curbside sites and remove the associated scoring penalty.
2. Clarify the permitting documentation that satisfies the requirement for curbside projects.
3. Waive or adjust the four-port minimum for curbside projects.
4. Allow multiple curbside sites to be submitted as a single project with one municipal authorization.
5. Accept a municipal partnership agreement, city letter of support, or other documentation as qualifying community connections documentation for curbside projects, or score curbside application on an alternative criterion.

It's Electric is deploying curbside charging with cities across California, including Alameda, Albany, Hayward, Los Angeles, and San Francisco. CIC funding could accelerate that work for the residents who need it most. We would welcome the opportunity to work with the Commission to refine the program so that curbside providers can serve multifamily residents clearly and efficiently.

Thank you for your continued leadership and your consideration.

Sincerely,



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