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Comment Received From: Lauren Suedkamp

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The Electric Vehicle Charging Association comment on Docket #: 16-ALT-02

Additional submitted attachment is included below.



Electric Vehicle Charging Association
INNOVATION FOR CLEAN MOBILITY

**California Energy Commission
Docket #16-ALT-02
2017-2018 Investment Plan Update
Alternative and Renewable Fuel and Vehicle Technology Program**

**Public Comments
Submitted by
The Electric Vehicle Charging Association (EVCA)
November 16, 2017**

Thank you for the opportunity to comment on the 2017-2018 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP).

EVCA is a coalition of electric vehicle charging organizations and companies dedicated to achieving clean transportation by promoting the continued growth of electric vehicle charging infrastructure, technology and services. More information about EVCA can be found at www.evassociation.org.

We applaud the CEC for its work supporting programs that advance EV infrastructure in California. The CEC has partnered with California's EV charging industry to dramatically expand EV charging in this state – from about 1,200 public and workplace charging outlets in 2011, to more than 12,900 outlets today, according to the Department of Energy, a ten-fold increase in just 5 years. This exponential growth has been made possible by supportive policies instituted by the CEC and other agencies. These policies have helped grow a competitive and vibrant charging station industry comprised of multiple providers.

In general, EVCA is very supportive of the direction that the CEC has taken in promoting deployment, which has deployed thousands of stations at very reasonable costs by embracing a competitive approach that in turn has fostered innovation. Based on our review of prior awards, we believe it is vital to continue the CEC's support for EV

charging as a number of qualifying projects went unfunded simply because of a lack of funds.

The challenge for charging station providers is planning and implementing new stations with two variables in play: state policy and technology disruption. New technology breakthroughs in fast charging and other areas provide significant opportunities to build out underserved transportation corridors, allowing for more stations and seamless longer distance EV trips. State policies and funding priorities should anticipate and support new technologies.

With this in mind, EVCA offers the following specific suggestions:

Include EV charging sector representation on the CEC Advisory Committee. The CEC Advisory Committee is an important outlet for policymakers to learn first hand about new market and technology opportunities, allowing them to create flexible and creative policies that benefit the greatest number of EV drivers.

Currently, the EV charging industry is underrepresented on the Advisory Committee. We believe having a representative from EVCA on this Committee would add an important perspective. We are a non-profit and vendor neutral organization, focused on educating policymakers, stakeholders and members of the public on policies that will expand clean transportation. As the industry innovates and matures rapidly, the on-the-ground perspective we would provide through the experience of our members would raise issues and identify solutions that might not otherwise come to light.

Consider a more nimble process to support EV infrastructure investments. The CEC may be able to expedite deployments by focusing on providing rebates to property owners or service providers for charging stations for both L2 and DCFC. This will ensure the most rapid deployment of charging stations by protecting the competitive environment. To expedite deployments and maximize the number of stations, rebates should have flexible terms and be available to either the property owner or the service provider.

Ensure station reliability by requiring grant recipients to commit to maintaining stations. In a fast changing industry with emerging protocols and technology upgrades, maintenance costs for EV charging stations are significant. Grants to support this function will allow more stations to be built and will positively impact the quality of service at existing stations. Rebate recipients should be required to provide a minimum service level for a set period of time as a condition of the rebate -- ensuring that utility

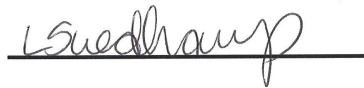
investments benefit drivers. EVCA's service provider members all offer maintenance and service warranties.

Coordinate with other agencies like the California Air Resource Board and the PUC to ensure that EV infrastructure investments are maximized and coordinated.

Cross agency coordination provides benefits by maximizing available state resources and program benefits in pursuit of a common goal. For example, as a trustee for the State of California's Appendix D funding, CARB should, in addition to directing investments under Appendix C of the consent decree, seek to direct 15% of the Appendix D funding towards EV charging infrastructure. This could be accomplished in a way that fortifies and supports both the priorities in the CEC Investment Plan, as well as related strategies to fund critical EV infrastructure projects, including those serving disadvantaged communities and multi-unit dwellings.

Thank you for the opportunity to submit these comments. We appreciate the shared mission of EVCA and the California Energy Commission to support zero emission vehicles in California.

Regards,

A handwritten signature in cursive script, appearing to read "LSuedkamp", is written over a solid horizontal line.

Lauren Suedkamp
The Electric Vehicle Charging Association