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Ongoing EV Readiness Funding

Additional submitted attachment is included below.
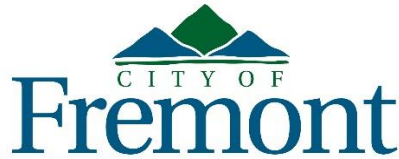
November 16, 2017

Commissioner Janea A. Scott
California Energy Commission
1516 9th Street
Sacramento, CA 95814

Subject: Comments on the Draft 2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program

Dear Commissioner Scott,

Thank you for your leadership on the draft FY 2018-19 funding plan and for the opportunity to submit the following comments for Energy Commission consideration.

We agree with the 2016 ZEV Action Plan (p26) recommendation that the Energy Commission "[c]ontinue to support activities identified in Regional ZEV Readiness Plans such as infrastructure permitting, siting and installation processes as well as ZEV awareness, local government code adoption and training". We appreciate the Energy Commission's consideration of releasing existing FY 2016-17 funding for this category. We recommend also allocating $3 million in the FY 2018-19 investment plan for these activities, which are critical in supporting California's ambitious ZEV deployment goals (see ARB's Mobile Source Strategy).

For example, it is well known that pre-wiring buildings for ZEV charging infrastructure during initial construction is simpler and more cost effective than retrofitting a building once occupied. To address this, the state currently requires Electric Vehicle (EV) Readiness at 3% of newly constructed multifamily parking spaces. However, this requirement alone will not enable California to meet its ambitious ZEV deployment goals. This is where development and adoption of local codes are critically important.

To that end, in 2016-17 the cities of Fremont and Oakland, and the City and County of San Francisco, with technical assistance from Energy Solutions, successfully developed and adopted Ordinances for new construction and major renovation that (among other things) raised the baseline for EV Readiness from 3% of parking spaces in multifamily to 20% across all sectors. These new reach codes will likely result in more than 10,000 ZEV-ready residential and commercial parking spaces by 2025, and now serve as a model for replication by others. Access to funding in FY 2018-19 for ongoing EV Readiness would enable these local governments to leverage their collaborative experience to focus on addressing barriers associated with charging infrastructure deployment in existing buildings. Without prioritizing solutions development to address these barriers, local governments will be limited in advancing ZEV adoption.

Finally, we very much appreciate that the Energy Commission has identified infrastructure for medium-and heavy-duty vehicles, which are a major source of local criteria air pollutants, as a priority. Because of their strong relationships with the community, including private sector fleets, tech companies, and distribution points like Ports and airports, local governments are well positioned to utilize FY 2018-19 funding to develop pilot projects that provide technical assistance and lead to market transformation of medium-duty delivery and passenger shuttle applications.

Thanks again for the Energy Commission's ongoing support of initiatives that help to advance the climate action goals of local governments and the State of California.

Sincerely,

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