

## DOCKETED

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*Comment Received From: Cory Bullis*

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**EVCA Comments on ARFVTP 2018-19 Updated Investment Plan**

*Additional submitted attachment is included below.*



**Electric Vehicle Charging Association**  
INNOVATION FOR CLEAN MOBILITY

March 19, 2018

Janea Scott  
Commissioner, Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

**RE: Comments on Advanced and Renewable Fuel and Vehicle Technology Program - 2018-19 Investment Plan Update**

Dear Commissioner Scott,

On behalf of the Electric Vehicle Charging Association (EVCA), thank you for the opportunity to provide comments on the California Energy Commission's Advanced and Renewable Fuel and Vehicle Technology Program (ARFVTP). For the last 10 years, this program has been critical to accelerating the transformation of the transportation sector – especially for electric vehicles (EVs). To date, ARFVTP has successfully deployed over 7,500 EV charging stations across multiple locations, including residential, fleet, workplace, multifamily, public, and corridor applications. We thank you for your leadership in helping to achieve this.

EVCA is a not-for-profit trade organization of ten leading EV charging industry member-companies. EVCA's mission is to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the expeditious and efficient adoption of EVs and deployment of EV charging infrastructure.

EVCA strongly supports Governor Brown's Executive Order B-48-18, which calls for 5 million zero-emission vehicles by 2030 and 250,000 EV charging stations, including 10,000 DC fast chargers. However, while the state has nearly 340,000 EVs on the road with over 16,000 public and nonresidential private sector charging outlets, it is still very far from reaching its goals. Given our progress to date in reaching these goals, the state, now more than ever, will need to double down on EVs and EV charging infrastructure to not only meet the requirements of the Executive Order, but to also reach its long-term GHG emission reduction goals for 2030 and 2050 respectively. Therefore, we would like to provide the following comments on the Investment Plan:

- 1) Continue to invest a diverse set of locations that support charging wherever drivers need to charge, including multi-family, residential and workplace locations;**

ARFVTP has a proven track record of deploying different types of charging stations that support different market segments. We support this direction and recommend that the CEC continue to build on this record of success.

**2) Funding should be structured through a first-come first-serve voucher system**

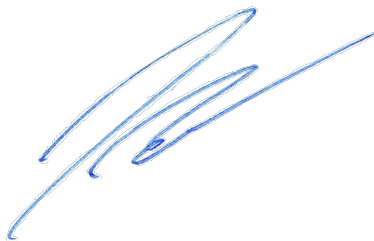
Applicants need a streamlined, simple process for applying for this funding to help facilitate fast and easy deployment of EV charging infrastructure. Application and documentation requirements also need to be made clear at the time of applying or before for this funding so that applicant know everything that is required of them with their project ahead of time. Voucher programs are one of the best ways to help facilitate this. There are many great examples of this kind of system, including the Air Resources Board's Hybrid and Zero-emission Truck and Bus Voucher Incentive Project (HVIP). EVCA recommends that CEC release this funding through a voucher system, and look to programs like HVIP for inspiration on how to structure this.

**3) A portion of ARFVTP's funds should support deployment of medium- and heavy-duty EV charging infrastructure;**

The Investment Plan correctly recognizes that medium- and heavy-duty EVs have charging infrastructure needs that differ from light-duty vehicles. Medium- and heavy-duty EV charging infrastructure presents its own set of unique challenges that are a barrier to adoption for fleet operators, requiring further research and development that deploy innovative charging solutions. Because of this, we recommend that the CEC allocate a portion of ARFVTP's funds to research, develop, and deploy medium- and heavy-duty EV charging infrastructure.

Thank you for considering our recommendations. As you work toward finalizing the 2018-19 Investment Plan, please consider EVCA as a resource for insight into both the EV charging and the broader EV industry. We offer a continuing partnership to usher in an era of transportation innovation.

Sincerely,



Jim Ross  
Director, EVCA