

DOCKETED

Docket Number:	17-EVI-01
Project Title:	Block Grant for Electric Vehicle Charger Incentive Projects
TN #:	222298
Document Title:	CaETC Comments Re Block Grant for EV Charger Incentive Projects
Description:	N/A
Filer:	System
Organization:	CaETC/Hannah Goldsmith
Submitter Role:	Public
Submission Date:	1/22/2018 11:54:26 AM
Docketed Date:	1/22/2018

Comment Received From: Hannah Goldsmith

Submitted On: 1/22/2018

Docket Number: 17-EVI-01

CalETC Comments Re: Block Grant for EV Charger Incentive Projects

Additional submitted attachment is included below.



January 22, 2017

California Energy Commission
Docket Office, MS-4
Docket No. 17-EVI-01
1516 Ninth Street
Sacramento, CA 95814
docket@energy.ca.gov

Re: Block Grant for Electric Vehicle Charger Incentive Projects

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide feedback on the California Energy Commission's (CEC's) CALeVIP rebate program being implemented by the Center for Sustainable Energy (CSE).

CalETC supports and advocates for the transition to a zero-emission transportation future as a means to spur economic growth, fuel diversity and energy independence, ensure clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation including plug-in electric vehicles of all weight classes, transit buses, port electrification, off-road electric vehicles and equipment, and rail. Our board of directors includes: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, and the Southern California Public Power Authority. Our membership also includes major automakers, manufacturers of zero-emission trucks and buses, and other industry leaders supporting transportation electrification.

We support the efforts of the CEC to promote the adoption of zero-emission vehicles (ZEVs) and equipment. Although California is leading the nation in ZEV adoption, our state still has a long way to go to reach the goals in the Governor's Executive Order B-16-2012: 1.5 million ZEVs on California roads by 2025 and zero-emission vehicle infrastructure able to support 1 million vehicles by 2020. In addition, the state must implement SB 1275 (De León, 2014) and SB 1204 (Lara, 2014), which set targets for the deployment of 1 million zero- and near-zero-emission vehicles by 2023, access to these vehicles by disadvantaged and low- and moderate-income communities, and deployment of zero- and near-zero-emission medium- and heavy-duty vehicle technologies.

We would like to echo the comments made by Kitty Adams of Adopt a Charger. We support the available rebate levels, \$4,000 for a single port and \$7,000 for a dual port station. We also support the streamlined approach to funding electric vehicle (EV) charging-infrastructure projects, and the online application process developed by CSE.

However, we have concerns regarding the program requirement for Energy Star Certification. Currently, only one EV-charging-equipment manufacturer (ChargePoint) offers charging stations that are eligible for the rebate.¹

Energy Star Certification for EV-charging equipment is new and the federal administration may not continue the Energy Star Certification program. Due to these factors, we are concerned that charging-station manufacturers may be unable to become Energy Star Certified in a timely manner or at all.

While we support ensuring the energy efficiency of charging stations, we also want to ensure that this program stimulates innovation, protects customer choice, and supports competition. As it stands, the program reduces competition and is essentially a sole-source procurement.

Thank you for considering removing the Energy Star Certification requirement for this program for the time being to open the marketplace and allow for the greatest amount of flexibility for achieving the necessary level of infrastructure in California. Please do not hesitate to contact me should you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Hannah Goldsmith". The signature is fluid and cursive, with the first name being more prominent.

Hannah Goldsmith, Project Manager
California Electric Transportation Coalition

¹ <https://www.energystar.gov/productfinder/product/certified-evse/results>