

DOCKETED

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EVCA Comments on B-48-18 CEC Workshop

Additional submitted attachment is included below.



Electric Vehicle Charging Association
INNOVATION FOR CLEAN MOBILITY

May 18, 2018

Ms. Jennifer Allen
California Energy Commission
Fuels & Transportation Division
1516 9th Street
Sacramento, CA 95814

Re: Staff Workshop on Governor's Executive Order B-48-18 – Electric Vehicle Charging Association's Comments

Dear Ms. Allen,

On behalf of the Electric Vehicle Charging Association, I would like to thank you and the Fuels & Transportation Division staff for your tireless efforts to advance deployment of EV charging stations, and to implement the Governor's Executive Order.

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.

We respectfully offer, for your consideration, the following comments on the Executive Order, as it relates to how the Energy Commission will use its funds through the Advanced and Renewable Fuel and Vehicle Technology Program (ARFVTP):

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. As it relates to the planned voucher incentive project for Southern California, we ask that the Energy Commission broaden the project beyond DC fast chargers to include Level 2 (L2) charging stations. There is a greater need for publicly accessible charging stations beyond DC fast chargers (DCFCs), especially in and around residential areas, that will be increasingly critical for consumers to access. L2 charging stations can typically be

located closer to residents that do not have access to home charging. While Southern California has robust charging infrastructure in many locations, there is still significant room for growth for both L2 charging stations and DCFCs if the state is to succeed in reaching the goals of the Executive Order.

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

EVCA supports the Energy Commission's use of CALeVIP to the maximum extent feasible for commercially available charging infrastructure. 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 applicants know everything that is required of them with their project ahead of time. CALeVIP is a great model that achieves this.

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

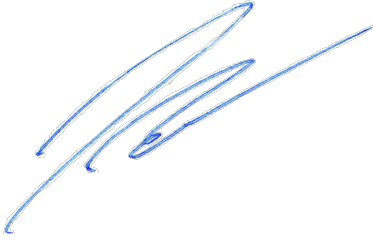
We applaud Energy Commission staff's recognition of the importance of investing in medium- and heavy-duty vehicle charging infrastructure. Medium- and heavy-duty EVs have charging infrastructure needs that differ from light-duty vehicles. Medium- and heavy-duty EV charging infrastructure presents its 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 support funding multiple types of medium- and heavy-duty charging infrastructure in various vehicle types within reason, so as to foster innovation in this area while still leaving significant funding available for light-duty charging infrastructure deployment.

4) Do not mandate credit card readers on charging stations

EVCA's members and other charging station providers have developed innovative payment mechanisms to process EV charging station transactions. These innovative methods are quickly outdating current methods of payment, such as credit cards. We respectfully request that the Energy Commission does not mandate the installation of credit card readers as part of its deployment of charging stations through ARFVTP. Credit card readers could potentially increase costs of charging stations by \$800 to \$1,000, which effectively doubles the cost of a L2 charging station. This will undermine the effectiveness of Energy Commission funding to deploy more charging stations faster, and potentially saddles charging stations with an outdated technology that consumers will not use.

Thank you for considering our recommendations. As you work further to implement the Executive Order, 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,

A handwritten signature in blue ink, consisting of several fluid, overlapping strokes that form a stylized representation of the name 'Jim Ross'.

Jim Ross
Director, EVCA