

**DOCKETED**

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*Comment Received From: Kitty Adams*  
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**Expand SoCal Incentive Project under CALeVIP to include Level 2 charging**

*Additional submitted attachment is included below.*

# Adopt a Charger

May 23, 2018

California Energy Commission

RE: Staff Workshop on Executive Order B-48-18 (ZEV Executive Order) and Staff Workshop on Southern California Incentive Project Under CALeVIP

Adopt a Charger, Inc. (AAC) is a 501(c)3 non-profit organization, based in California that has facilitated EV charging installations in 8 states. Our mission is to raise awareness of plug-in electric vehicles (PEV) by broadening EV charging infrastructure. Our unique approach matches a funding source with a high-profile destination like National Parks, State Parks, museums and universities. We solicit funding to install “free to the user” EV charging to encourage communication between the EV curious and actual owners, who have proven to be enthusiastic sales people for the new technology. AAC acknowledges that people need to be able to see cars plugged in to make the connection that these vehicles run on electricity.

AAC specializes in inexpensive, noncomplex, reliable solutions, where drivers simply pull up and plug in. There is no need for membership, RFID card or authorization of payment. Included in the project budget is 3 years’ operation and maintenance. Typically, the only cost to the site host is the relatively insignificant cost of the additional electricity. Because these chargers are offered “free of charge” to the driver, we get high utilization and maximize GHG reduction.

AAC is grateful to have received funding for projects from the CEC ARFVTP program. Most recently the grant to install up to 61 EVSE at 12 California State Parks. Prior to this grant, AAC worked with South Coast AQMD and LADWP to utilize CEC funding at Leo Carrillo State Beach, Malibu Creek State Park, Baldwin Hills Scenic Overlook, The Natural History Museum of LA County, the Getty Center, Getty Villa, LA Zoo, 3 popular LADOT parking lots, Stinson Beach, Fort Ross, Cal Poly Pomona and with Schneider Electric at the Red Cross of San Jose. Each project provided insight for upcoming solicitations, based on lessons learned through past experiences.

Most of the locations that AAC has worked with are the difficult locations to commercialize, and therefore require public funding. Unlike the “for profit” charging schemes, which seek to install EVSE in urban areas and commercial zones where there is a large concentration of EVs, AAC looks to fill the gaps in underserved areas. **Of particular interest is how to broaden charging infrastructure in disadvantaged communities.** With this goal in mind, I offer the following suggestions:

In response to the Staff Workshop on the Southern California Incentive Project under the CALeVIP, I suggest including Level 2 EV charging infrastructure and not limit funding to DC Fast charging projects only. Los Angeles County and the surrounding area is a sprawling metropolis where plug-in hybrid vehicles outnumber pure battery electric vehicles. Currently there are no PHEV models available that can utilize DCQC. If the goal is to maximize EVMT, it is imperative that we continue to fund Level 2 EV charging projects.

I posed this question during the Staff Workshop on the Governor's Executive Order B-48-18 and was told the decision was made based on feedback that there are other funding opportunities in LA County, San Bernardino, Riverside, and Orange County for level 2 EV charging. The incentives that I am aware of fall short of providing the needed funding to achieve the number of Level 2 chargers necessary to grow the number of PEV in this region. The SCE Charge Ready Pilot program, which was oversubscribed for L2 charging, did not work for a number of properties because of the requirement to provide 10 EV charging spaces. Even the accommodation for DAC to only provide 5 spaces, was often times too much. The LADWP commercial rebate program of \$4,000 per charger, is a good start but in my experience the cost of installing a level 2 EV chargers is upwards of \$9,000 per parking space (not including networking and maintenance costs). It is still necessary to combine incentives to defray the cost of a project.

I am currently working with a Section 8 housing provider to install EV charging at multi-unit dwellings in DAC. I was counting on the CALeVIP program to fund Level 2 charging for the residents. MUD in DAC has been identified as the biggest challenge for adoption of PEV, and funding for 240-volt charging is essential to making these projects happen. Just today I participated in an outreach event as part of the CalETC "Prove it Campaign". The houses of worship were all interested in installing level 2 chargers for the congregants and community, but there is currently a lack of funding for these locations.

Another drawback to only offering assistance for DCQC projects are the high cost of energy upgrades, planning, installation and equipment. These projects typically are in excess of \$100,000 making it impossible for disadvantaged communities to come up with the upfront funding required. If I am not mistaken, the last CEC solicitation that funded Level 2 charging was back in 2014, and as a result there is pent up demand for this category.

Thank you for considering my suggestions.  
Sincerely,

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