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**SCPPA Comments on the Southern California Incentive Program under
California Electric Vehicle Infrastructure Project**

Additional submitted attachment is included below.



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May 23, 2018 | Submitted Electronically

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 17-EVI-01
1516 Ninth Street
Sacramento, CA 95814-5512

Re: SCPPA Comments on the Southern California Incentive Program under the California Electric Vehicle Infrastructure Project

The Southern California Public Power Authority (SCPPA) is pleased to submit these comments regarding the impending implementation of the Southern California Incentive Program (SCIP) as part of the new California Electric Vehicle Infrastructure Project (CALeVIP) discussed at the April 17, 2018 workshop. SCPPA commends the California Energy Commission and Staff for a continued focus on the importance of developing charging infrastructure to support the growing clean transportation market. CALeVIP and the associated incentive programs, which provide rebates to developers of EVSE infrastructure, are essential for encouraging and incentivizing infrastructure development.

As one of the many participants at the most recent workshop to introduce SCIP, hosted at the South Coast Air Quality Management District (SCAQMD), SCPPA was encouraged to hear the proposed structure of SCIP – and we look forward to participating to the greatest extent possible. However, SCPPA would like to recommend two modifications or revisions to the proposed regulations associated with SCIP implementation:

1. **Lower the minimum number of DC Fast Chargers (DCFC) required at each potential site under SCIP to one.** There are numerous reasons to consider reducing the minimum number of units at each potential site to one. The greatest of these is that there are very few locations that will have an additional or “extra” 100 or 125 kVA in their electric service to support a minimum of two DCFCs, as originally proposed at the SCAQMD workshop. However, if the minimum number of DCFCs was reduced to one, we believe that the number of sites that will have sufficient capacity to support a single 50 kW charger will increase substantially and improve the probability of reaching the long-term DCFC installation goals behind SCIP. In addition, there are many existing sites in Los Angeles County with a single DCFC unit that have a single port. None of the single DCFC units can be upgraded to dual-combo port DCFCs if the minimum requirement is not reduced.
2. **Include funding and support for the installation of Level 2 chargers as a complementary or supplemental addition to the installation of DCFCs under SCIP.** The EV charging network in Southern California is widely seen to be lacking. The addition of DCFCs through SCIP would be a great improvement. SCPPA strongly encourages the Energy Commission to consider allowing applicants to receive proportional rebates that partially offset the cost of installing Level 2 chargers at the same sites as the DCFCs currently included in SCIP. Level 2 charging needs are currently more prevalent because DCFCs are not an option for many EV drivers on the road in today’s market. DCFCs will be an important piece of the EV charging network, but for the foreseeable future Level 2 charging is needed as much, if not more, than DCFCs in Southern California.

SCPPA appreciates the opportunity to inform the Energy Commission on this important issue. We thank you for your consideration of these recommendations and look forward to the issuance of the final regulations for SCIP implementation in the coming months.

Respectfully submitted,



Tanya DeRivi
Director of Government Affairs