

**DOCKETED**

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*Comment Received From: Sac area Plug in Electric Vehicle Collaborative*  
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**Comment Letter to CEC for Docket No. 17-EVI-01 Block Grant for Electric Vehicle Charger Incentive Projects**

Document Attached

*Additional submitted attachment is included below.*

# Sacramento Area Plug-in Electric Vehicle Collaborative



October 9, 2018

Comment Letter to CEC for: Docket No. 17-EVI-01 "Block Grant for Electric Vehicle Charger Incentive Projects"  
Electronic Submittal-on line

Dear Mr. Fauble and CEC members:

On behalf of the Sacramento area Plug-in Electric Vehicle Collaborative (PEV Collaborative), I want to start by thanking you for selecting Sacramento County as the focus area of one of the CALeVIP Incentive Programs. Our collaborative members are very excited about this great opportunity, and are prepared to assist and support the successful deployment of this program. This incentive funding will further assist Sacramento, the region, and the state in meeting EVSE charging infrastructure needs, gaps and goals!

As you and others are aware, Sacramento County and the PEV Collaborative have been working together for years to advance electric and zero emission vehicle adoption through strategically identifying locations and charging infrastructure needs so that chargers are where people need and will use them. It is with the goal that more people will move to owning an electric vehicle rather than an internal combustion vehicle. Additionally, we appreciate the opportunity to share our comments and provide input on the Block Grant for Electric Vehicle Charger Incentive Projects Program.

Many of the comments below were shared at the Sacramento Public Workshop September 11, 2018. As was mentioned at the Public Workshop, the CALeVIP incentive will be used with other incentives available to leverage all resources and investment to the greatest amount possible. This incentive investment in Sacramento will help to develop replicable models that can be implemented across the region and state. It is with this in mind that the PEV Collaborative offers the following comments.

1. Incentive Amounts: While we appreciate the \$14m block grant amount and acknowledge the large amount of this funding, local experience has indicated how quickly funding can be spent on EV charging infrastructure projects. Recognizing this, the proposed rebate amounts on a project-by-project basis are extremely low and not likely to garner the interest the program seeks to achieve. As presented by Bill Boyce from SMUD, planning costs alone can be in excess of \$300,000 with site agreements, pre-planning and the like. SMUD is currently offering \$100,000 rebates on DC Fast Chargers and there have been only a few to utilize this incentive. SMUD incentives and the CALeVIP incentives will certainly be stacked with any other incentives available. We recommend significantly increasing the incentive amounts for both Level 2 and DC Fast Chargers in order for this program to be fully subscribed and utilized as desired by the AB 8 legislation.
2. Credit card/chip readers: Please keep this as part of the product requirements. There are still many individuals that do not have a smart phone, and please ensure there is an option for those using pre-paid cards.

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## PARTNERS:



3. Swap out older chargers & support upgrading existing infrastructure: We support and encourage that incentive funds be allowed to replace older and outdated chargers. Furthermore, allow funding to be used to upgrade existing infrastructure to provide for networking, power sharing, circuitry or other similar upgrades.
4. Requirement for Network Charging Solutions: We ask, especially in disadvantaged community areas, that flexibility is allowed in not requiring all chargers to be networked. In order to get chargers in the various underserved areas, we recognize the importance of flexibility in how electricity is monitored. Flexibility in networking requirements also responds to the program's goals of achieving adoption in disadvantaged areas. Non-networked chargers can provide significant cost savings, which may help overcome financial barriers in these communities. In many instances, the simple solution may be the best (cheapest) solution.
5. Coordination & Navigation: There is much in the world of EV's happening in Sacramento. We ask that coordination and outreach begin early and that you utilize the Sacramento area PEV Collaborative as one of your key coordination points. Almost everyone you need to work with is part of the collaborative and we're wanting to have consistent information and messaging. To this point, we would also ask the CEC to provide funding for one of our Collaborative Partners to facilitate applications and navigating the whole process. The application for the incentive is only one part of the entire necessary process and it can be confusing for people to navigate when they have to go to SMUD, the cities or counties for permits, where are the other incentives and so on. Funding for local assistance will make for a smoother and more successful process.
6. Definition of Disadvantaged Communities: While Cal EnviroScreen is frequently used to identify disadvantaged communities, it provides a limited picture of what is truly disadvantaged and challenged. A broader tool that considers transportation access and developed in collaboration with the Ca State Dept. of Public Health is the Healthy Places Index <https://healthyplacesindex.org/>. This tool further helps to identify broader factors contributing to the make-up of DAC's, where lack of mobility and access to transportation are significantly lacking. We encourage you also utilize this tool in determining where disadvantaged communities are, identifying what the challenges are, and utilize projects like these to provide needed solutions.
7. Outreach: As referenced above coordination and collaboration is important. In addition to utilizing the PEV Collaborative to enhance your outreach program we also recommend meeting with: Community based organizations, Sacramento Housing and Redevelopment Agency, Affordable Housing Developers, PBIDs (Business Districts) to do effective outreach in disadvantaged communities and in commercial areas. Additionally, Electrify America is working with a local marketing firm to assist with program outreach. We recommend coordination of program efforts with local stakeholders.
8. Incentive Expenditure Flexibility: We recommend that incentive applicants with multiple sites be allowed to balance out their funding from one site to another. Flexibility that allows any leftover incentive funds (in the event that happens) from site 1 to be carried over and used at site 2 where infrastructure costs might be more costly; rather than having a per site limitation.
9. Shovel ready: If using the term shovel-ready, please define what that means exactly.
10. Incentive Funds for Planning & Permitting: We support allowing incentive funds to also be used for engineer drawings/plans, planning and permitting fees.
11. ENVISION Solar or Similar: We recommend allowing grant funds to be used for solar charging stations such as ENVISION Solar. We understand that the CEC might need to stipulate how long this equipment must remain on site and not be moved, but the cost for physically running infrastructure to some locations can be extremely costly and time consuming. Additionally the location might be perfect for charging but the electric infrastructure doesn't support it. Lastly, if the charger is underutilized it allows it to be moved (within whatever stipulations CEC makes) so that it can have higher utilization – that can't be done with hard wiring.

12. Eligible Site Expansion: We recommend that the CEC consider expanding eligible sites for DCFC in Sacramento to include: Regional Transit Stations/Park and Ride lots that can also support TNC charging needs for 1<sup>st</sup> mile last mile use; broaden government definitions to include special districts, joint power authorities (JPA), Libraries and Community Centers; and private parking garages, which often provide workplace charging.

Once again, thank you for the opportunity to comment and for considering our comments and recommendations. We greatly appreciate the CEC directing Block grant funding for Sacramento County for this important program.

Sincerely,



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