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EVgo comments RE: Alternative and Renewable Fuel and Vehicle Technology Program 2019-2020 Investment Plan

Additional submitted attachment is included below.

EVgo
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November 21, 2018

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814 -5512

RE: Docket No. 18-ALT-01 - Alternative and Renewable Fuel and Vehicle Technology Program 2019-2020 Investment Plan

To Commissioner Scott and Advisory Committee Members:

EVgo commends the California Energy Commission's (CEC) for its continued leadership in establishing California as the undisputed leader in transportation electrification and making strides towards the state climate goals. EVgo is proud to serve as a partner to the CEC and other industry partners to deploy our nation-leading public electric vehicle (EV) charging infrastructure enabling more Californians to access the benefits of electric vehicles (EVs) today. Nationally, the U.S. Department of Energy announced on October 22, 2018 that EVgo has the largest number of DC fast charging stations of any network in the country.[1] As mentioned in our October 12, 2018 letter to the CEC regarding the California Electric Vehicle Infrastructure Project (CALeVIP) 2019 roadmap, EVgo is leading the way for vehicle electrification with more than 90% of Californians now living within 35 miles of an EVgo fast charging station.

EVgo operates America's largest public EV fast charging network, with nearly 1100 fast chargers in 66 metropolitan markets. Currently, we have nearly 600 fast chargers deployed in California with many more sites under construction and dozens more coming this year. Primarily using DC fast chargers (DCFCs), EVgo fast charges more drivers for more miles than any public charging network in the nation. We provide over 75,000 monthly charges to 75,000+ EV drivers, powering EVs to drive over 5,000,000 miles monthly.

As cumulative California EV sales surpass 500,000, and especially as more transportation networking companies (TNCs) shift vehicle miles traveled to clean electricity, public DCFC access is more important than ever. As such, in September, we announced that EVgo plans to grow its fast charger count in our top two markets, the San Francisco Bay Area the LA Metropolitan Area, by 59% and 45%, respectively, by year-end 2018. In line with our current efforts, EVgo welcomes the opportunity to continue working closely with the CEC and State to expand that infrastructure to enable mass adoption of EVs through the Alternative and Renewable Fuel and Vehicle Technology Program (AFRFVTP).

As the national leader in public fast charging, EVgo supports the ARTVP 2019-2020 investment plan, especially as it relates to CALeVIP, which we see as critical for increasing the number of fast chargers to propel the state toward Governor Brown's 10,000 fast charger goal. As the CEC and advisory committee finalize the 2019-2020 plan and future plans, EVgo respectfully submits the following recommendations for consideration to optimize the CEC's investment in Electric Vehicle Charging Infrastructure.

1. **<u>Remove cap on number of chargers per site for CALeVIP eligibility</u>**

   As it stands, CALeVIP's program structure places a cap on the number of chargers on any given site. As California aims to increase EVs on the road to five million by 2030, we will see an increased trend to support these vehicles with sites that have 5-10 chargers, and sometimes more, per site. EVgo is now experiencing the emergence of adoption by a critical EV market: multifamily unit dwellers (MUD) who do not have access to home or work charging and are dependent on public charging hubs. EVgo intends to enable charging for these customers through a combination of modest sized stations distributed throughout MUD communities as well as larger, centrally located hubs that increase confidence of rapid charger availability when immediate charging is required by an EV driver.

[1] https://www.energy.gov/eere/vehicles/articles/fotw-1052-october-22-2018-four-networks-maintain-over-60-22343-level-2-and-dc

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Larger sites are a benefit to optimizing the impact of public investment as they share the electrical infrastructure across a larger number of chargers, and therefore sessions and charging minutes, reducing the cost per charger and maximizing the electric vehicle miles delivered per dollar spend. DCFC infrastructure supports EV drivers that come within a 3-5 mile radius of the charger during their commute or on other trips. As electric vehicle adoption increases, it's important that public charging stations accommodate the current and anticipated demand for charging. EVgo recommends that the cap on number of chargers per site is lifted to allow EV Service Providers to more effectively and efficiently deploy larger charging stations, otherwise known as plazas or hubs, to support EV adoption growth in areas that are anticipated to see higher charger utilization. Additionally, deploying in larger quantities will allow EVgo, CEC, and Center for Sustainable Energy (CSE) to better understand rider behavior as it relates to additional chargers per sites.

2. **Coordinate CALeVIP project launches with timing of other funding streams**

As stated in EVgo's October 2018 letter regarding CALeVIP, EVgo is supportive of the CEC allowing applicants to "stack" CALeVIP funding with other available funding opportunities, which would have the effect of further stretching CEC dollars to more charging stations. EVgo would echo this again for not only CALeVIP, but other ARTVP investments. As Commissioner Scott and other advisory members discussed during the workshop, close coordination is needed with air quality districts, utilities, and others that will soon launch their own funding opportunities for fast charging. Given how quickly funding has been allocated under the Southern California project, CEC coordination with these groups on timing will be critical for the possibility of any stacking across different incentives programs.

3. **Model funding program for ride share charging funding program after CALeVIP**

EVgo commends the CEC for recognizing rapidly growing electrified ride sharing services, otherwise known as TNCs, and agrees that dedicated PEV car and ride-sharing services present a prime opportunity for additional zero emission transportation options for Californians. While the investment plan calls for funding car and ride share demonstration projects, EVgo believes the funds would be maximized by allocating funds through a program modeled after CALeVIP, allowing for deployment of dedicated stations at much faster rates and providing much needed infrastructure for high mileage zero emission vehicles.

Given the critical role that TNCs have in serving the public and increasing public awareness of EVs, CEC investments toward ride share would be a valuable use of CEC investment funds. The public benefits from electrification of TNCs, particularly as more and more Californians are choosing to rely on ride sharing and forgoing personal vehicle ownership altogether. No time is better than the present to include ride share in the CEC investment plan, as legislation (SB1014) recently passed to require TNCs to reduce their greenhouse gas emissions. Similarly, ongoing discussions at the California Public Utilities Commission (CPUC) about the environmental implications of the TNC transformation – notably the TNC "disruption's" effect on greenhouse gas emissions – is creating increased pressure to electrify their fleets.[1]

Because individual TNC operators often drive upwards of 50,000 miles per year, companies are pursuing dedicated infrastructure for their drivers. The purpose of dedicated infrastructure is to ensure that TNCs can meet their greenhouse gas reduction goals, have charging infrastructure readily available so that drivers can minimize "dead time," and so that drivers may find available charging as quickly as possible so that they may serve their customers. In a CPUC report entitled *Electrifying the Ride-Sourcing Sector in California,* Lyft recently reported that most drivers on its Express Drive program have no access to home charging, which further points to the importance of fast-charging infrastructure to unlock TNC EV usage. Additionally, providing funding for dedicated TNC fast-charging infrastructure would have many ripple effects that promote electric vehicle use, both within TNCs and in the greater public.

First, TNCs account for an increasing share of California vehicle miles traveled, and access to fast-charging infrastructure is consistently listed as a key barrier to EV TNC deployment. According to the CPUC, "lack of

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access to fast charging was identified as the most significant barrier to EV use" and drivers with EVs "would have worked an additional 10 hours per week, on average, if they had access to faster and easier charging."

Second, TNC drivers with EVs serve as ideal EV ambassadors to the driving public. While dedicated charging infrastructure is not available to the public, TNC drivers serve the public and make their ride hailing services available to the public. Again referencing the *Electrifying the Ride-Sourcing Sector in California* report, the CPUC writes that exposure to EVs for both the public and TNC drivers "has been found to result in lasting positive impressions that influence subsequent vehicle purchase decisions." Sixty-seven percent of drivers reported that passengers discussed the car's EV technology at least once per work period, suggesting that the TNC sector can serve as a platform to expose passengers to EVs. Therefore, allocating funding to charging infrastructure for ride share would greatly increase TNC EVs on the road, which in turn would spur personal-use drivers to purchase EVs. Even in the case that a passenger does not ultimately purchase an EV, this has the direct GHG reduction benefit of rideshare customers replacing their own personal vehicle miles traveled with EV-powered TNC rides.

Finally, through our experience with our own public network, we have found that dedicated infrastructure for TNCs benefits the public by taking TNC EV drivers off of the public network. TNC drivers' need for frequent charges leads to queuing at stations. This can – and does - negatively impact the public charging experience at these stations for consumers. Our customers have told us that their fast-charging experience would be improved if ride sharing drivers had access to dedicated charging infrastructure.

Given the goals that California has for electrifying ride share, the service that TNC EV drivers provide to the public, and the necessity for expanded infrastructure dedicated to these drivers, EVgo respectfully requests that the CEC consider a CALeVIP-style program for TNC infrastructure.

EVgo thanks the CEC for the opportunity to provide input on this investment plan and extends itself as a resource to the Commission and advisory committee members in further planning. Please do not hesitate to contact us if we can answer any additional questions or be of further assistance.

Sincerely,

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