

DOCKETED

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Electrify America Comments - Sacramento County Incentive Project

Additional submitted attachment is included below.



March 22, 2019

Vice Chair Janea Scott
California Energy Commission
1516 Ninth Street, MS-32
Sacramento, California 95814

Re: Docket No. 17-EVI-01

Electrify America, LLC, appreciates the opportunity to comment on Docket 17-EVI-01, “Block Grant for Electric Vehicle Charger Incentive Projects.” Electrify America is investing \$2 billion in financially sustainable business opportunities that advance the use of zero emission vehicle (ZEV) technology, \$800 million of which must be spent in California.

On reviewing the Implementation Manual for Sacramento County Incentive Project, Electrify America has identified a number of issues which could adversely affect the project’s ability to effectively advance electric vehicle (EV) charging infrastructure, including EV charging stations installed by Electrify America. In particular, we have concerns regarding three elements of the program:

Low carbon fuel standard credit release – The proposed program would require participants to release claim to LCFS dispensed fuel credits to SMUD. This requirement would harm the ongoing economic viability of DC fast charging stations in the program, as LCFS credits are an important form of revenue in our industry. Electrify America believes that program participants should not be required to surrender this credit value, and we are concerned that this requirement will deter industry participation.

Cap on incentives per site – Electrify America is building a state-of-the-art, future-proofed network of DC fast chargers, installing numerous high-power DC fast chargers at each station in anticipation of future increases in the number of vehicles as well as power level of charging. In our second cycle of investment, Electrify America will be installing metro-oriented stations with standard designs averaging five chargers per site. In addition, TNC companies have strongly communicated the need for community-level charging stations with far greater capacity. By limiting this program to only the first four DC fast chargers per site, the program may be unintentionally discouraging charging providers from installing the types of large-scale, future-proofed charging installations that provide the necessary charging infrastructure for widespread adoption of EVs.

Charging standard requirements – In order to serve all EV drivers, Electrify America installs both non-proprietary DC fast charging standards, Combined Charging System (CCS) and CHAdeMO, at every location. However, not every charger we install includes both charging standards. By requiring every charger, rather than every site, to include both charging standards, the proposed program limits the flexibility of charging providers to install



appropriate equipment at charging stations, even when every site is capable of serving all customers.

Electrify America shares CEC's commitment to driving ZEV adoption in California, and we offer these comments and suggestions in the hopes of helping the CEC to attain our shared goals. We are deeply appreciative of the opportunity to share comments and suggestions. If you have any questions or concerns, you and your staff should please feel free to contact me at your convenience.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Matthew B. Nelson', with a stylized flourish at the end.

Matthew B. Nelson
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