

DOCKETED

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City of Sacramento Comments on Sacramento CAlLeVIP Program Requirements

Additional submitted attachment is included below.

March 22, 2019

Vice Chair Janea Scott
California Energy Commission
1516 9th Street, MS-32
Sacramento, CA 95814 -5512

SUBJECT: Docket No. 17-EVI-01

Dear Vice Chair Scott,

I write to express the City of Sacramento's strong support for the Energy Commission's selection of Sacramento County for the launch of a CALeVIP Incentive Program. Programs like CALeVIP are critical to advancing electric vehicle (EV) deployment to achieve both state and local goals. We commend the Energy Commission's leadership in EV infrastructure investment.

The City of Sacramento is committed to become the "Zero-Emission Vehicle Capital of California." Our adopted goal is to achieve 75,000 zero-emission vehicles (ZEVs) in Sacramento by 2025, representing our contribution to Governor Brown's goal of 1.5 million ZEVs statewide by 2025. The City is also a proud award recipient of the CEC's Phase 1 EV Ready Communities Challenge (GFO-17-604). Our team is currently conducting EV planning and analyzing infrastructure gaps and barriers to achieve our goal. Infrastructure investments by a wide variety of public and private partners are critical for EV deployment.

We appreciated the opportunity to participate in the Sacramento CALeVIP workshop on September 11, 2018. We also supported a written comment letter submitted by the Sacramento Area Plug-in Electric Vehicle Collaborative (October 9, 2018) to the Commission on many of the issues raised during the workshop.

Since that workshop, Energy Commission staff have added a new requirement to the program manual very suddenly that requires applicants forfeit Low Carbon Fuel Standard (LCFS) credits. Based on our discussions with leading national operators of DCFC infrastructure, we have concerns with this requirement. The intent of the program is to increase the number of DCFC in Sacramento County. However, by removing a key value stream for DCFC operations, we believe the requirement would pose a barrier, thereby reducing the overall investment in DCFC in Sacramento. The requirement would be counter-productive to the goals of the program, and slow progress in DCFC investment.

We also find it notable that this would be the first time such a requirement would be imposed through the CALeVIP program. This poses a potential to create an uncompetitive disadvantage in Sacramento relative to other regions. Operators of DCFC would simply build in other jurisdictions where they could maintain LCFS credits and thereby offset ongoing operational expenses. Private companies have limited resources for investment. The requirement would place the Sacramento DCFC market at a disadvantage by encouraging operators to invest in other areas where they can maintain LCFS credits while also accessing rebates for capital costs.

We commend strong partnership with SMUD and the forward-thinking reinvestment of revenue into the program. SMUD's leadership to expand program investment is exemplary, and we commend the important role SMUD is playing to support and amplify state investment. We applaud SMUD and the Energy Commission for partnering with the goal of accelerating the EV charging market in Sacramento. We simply wish to ensure successful realization of this goal. We request the program revisit LCFS requirements in order to truly incentivize investment in DCFC for our community.

Thank you for your consideration and the opportunity for input.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Venema". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jennifer Venema
Sustainability Manager
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