

DOCKETED

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EVgo Comments on Clean Transportation Program Investment Plan

Additional submitted attachment is included below.



11390 W. Olympic Blvd, Suite 250
Los Angeles, CA 90064

August 9, 2019

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

Re: Revised 2019-2020 Investment Plan Update for the Clean Transportation Program

Dear Commissioner Monahan:

As the nation's largest public fast charging network, EVgo commends the California Energy Commission (Energy Commission) for its leadership in helping the state meet its climate and zero emission vehicle (ZEV) goals and appreciates the Energy Commission's partnership as we continue to develop a robust public fast charging network across California. Today, more than 80% of California residents live within a 15 minute drive of an EVgo fast charger, and we continue to expand our state-leading network including through our participation in Energy Commission programs like CALeVIP and the corridors grant.

Fast charging infrastructure is critical to reach the state's increasing population of EV drivers and is especially crucial to enabling electrification for drivers without reliable access to charging at home or in the workplace, residents of multi-unit dwellings who rely on public charging for the majority of their charging needs¹, drivers utilizing key transit corridors, as well as light duty vehicle (LDV) fleets, including car sharing and ride sharing applications. EVgo continues to deliver to expand EV access to these consumers as ZEV penetration grows. In addition to EVgo's more than 1,200 DC Fast Chargers (DCFC) operating across the nation -- more than half of which are in California -- we have also completed construction on 100 fast chargers in the second quarter alone, and will have more than 1,350 operational by summer's end. Given California's leadership through funding programs from state agencies such as the Energy Commission, EVgo is on track to double our nationwide capacity by the end of 2020.

EVgo wants to reiterate its support for the Investment Plan and believes the plan is strengthened by its updated emphasis on ZEV adoption and ZEV infrastructure. EVgo appreciates the opportunity to provide feedback on the Clean Transportation Program Investment Plan, and as a follow-up to its verbal commentary at the August 5 workshop, EVgo respectfully submits the below points for the Energy Commission's consideration.

1. CALeVIP is the optimal program design for accelerating EV deployment

Increased and continuous funding is key to growing the state's EV infrastructure and meeting greenhouse gas reduction targets. EVgo applauds the Energy Commission staff and the Center for Sustainable Energy (CSE) for their work to implement CALeVIP. The administrative simplicity of CALeVIP compared to other extensive grant programs minimizes administrative challenges faced by both program staff and grant applicants, serving to increase the velocity of EV charging deployments to meet state goals. EVgo strongly supports the extension and evolution of CALeVIP and recommends the Energy

¹International Council on Clean Transportation, Quantifying the Electric Vehicle Charging Infrastructure Gap Across U.S. Markets (January 2019), p. 9,
https://www.theicct.org/sites/default/files/publications/US_charging_Gap_20190124.pdf

Commission chart a course for a transition to a truly statewide, “always open” program to minimize disruptions to the market while enabling Electric for All. EVgo looks forward to participation in the workshops for the 2020 projects and filing subsequent comments for staff’s consideration.

2. EVgo supports an expanded presence of community-based organizations (CBOs) on the Advisory Committee.

EVgo appreciated the thoughtful presentation by the Disadvantaged Communities (DAC) Advisory Committee. EVgo strongly supports expanding equity and notes that there is tremendous alignment in deploying fast charging infrastructure in and around communities with high concentrations of multi-unit dwellings, many of which overlap with communities that have been disproportionately impacted by pollution. Nearly one quarter of all Freedom Station sites EVgo has deployed as part of the NRG Settlement are located in disadvantaged communities, as well as a new suite of “Equal Access Charging Hubs” (EACH) in Richmond, San Diego, Inglewood, and elsewhere.² Compared to AB 1550, which defines low-income communities as census tracts with median household incomes at or below 80% of the statewide median income or with median household incomes at or below the threshold designated as low-income by HCD’s State Income Limits, EVgo has located 88 out of 218, or 40% of Freedom Stations in low-income communities.

EVgo supports the recommendations by GRID Alternatives, Greenlining Institute, and the Disadvantaged Communities Advisory Group to expand the Clean Transportation Advisory Committee to more CBOs. Based on EVgo’s experience implementing the aforementioned EACH program³, EVgo knows first-hand the successful role that CBO partners serve in encouraging ZEV adoption in communities that bear a disproportionate pollution burden and welcomes their input on future investment plans. Additionally, EVgo supports innovative partnerships with these communities to get vehicles and access to public charging in the hands of those who might not otherwise be able to take advantage of the benefits of EVs.

3. Bloomberg presentation overestimates the business case for energy storage in DCFC deployments.

EVgo disagrees with some of the data presented. While EVgo strongly believes that energy storage will be an increasingly important tool in the next several years to increase grid capacity, we believe that BNEF is overestimating IRR from public charging deployments with energy storage for distributed retail DCFC, the most driver-friendly option that maximizes fast charging access in convenient locations. EVgo has 14 energy storage systems installed across multiple service territories in California with the data to see load profile by charger by hour and thus apply that load profile against a variety of current, past and pending rate structures. Without the benefit of real world siting demands, site host preferences and operating data, it is possible that BNEF can construct hypothetical cases that are at odds with EVgo’s real world experience. We would be happy to be a resource to the Energy Commission on the results of our demonstration project with storage. Please note that our Chief Commercial Office sits on the Board of the Energy Storage Association, the national energy storage trade association, as EVgo is deeply engaged in working on the future of energy storage integration with EVSE, especially for medium and heavy duty EV charging demands.

² <https://www.cpuc.ca.gov/General.aspx?id=5936>

³ <https://www.evgo.com/communities-charging-for-change/>

4. **EVgo respectfully asks for the most up-to-date data on the NRG Settlement to be included in the Investment Plan.**

EVgo thanks the Energy Commission for including a note on the NRG Settlement on page 56 in the plan. However, EVgo notes that the information provided is from a January 2018 report on the 2017 results of the program. It reads:

“EVgo installed 200 fast chargers and is expected to install electrical infrastructure to support nearly 10,000 Level 2 chargers by December 2018...”

EVgo respectfully requests that the Energy Commission include data from its most recent public report, which has a publication date of July 2019. To ensure that the Energy Commission and the Advisory Committee have the most up-to-date data in planning, EVgo suggests the following updated language with the most accurate charger count:

“Across all programs, a total of 562 DCFC will be installed under the Settlement, more than twice the originally specified 259 DCFC due to cost efficiencies. In addition, as of Q2 2019, EVgo and NRG completed 6,879 make-ready stubs at 792 sites.”

For more information on other programs under settlement, including the modified targets for Level 2 make ready stubs, energy storage demonstration project, car sharing program with Green Raiteros, and the EACH sites mentioned above, EVgo will be glad to share the most recent report with staff so that the Investment Plan reflects the most up-to-date market information.

Conclusion

EVgo thanks the Energy Commission for its leadership on ZEV and for the newly strengthened Investment Plan. Please do not hesitate to be in contact if we can answer any questions or be a resource.

Sincerely,



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