

DOCKETED

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Comment Received From: Electric Vehicle Charging Association
Submitted On: 8/16/2019
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**Re: EVCA Comments on the Revised Lead Commissioner Report for the
2019-20 Clean Transportation Program Investment Plan Update**

See Document attached

Additional submitted attachment is included below.



Electric Vehicle Charging Association
INNOVATION FOR CLEAN MOBILITY

August 16, 2019

Ms. Patricia Monahan
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: EVCA Comments on the Revised Lead Commissioner Report for the 2019-20 Clean Transportation Program Investment Plan Update

Dear Commissioner Monahan,

On behalf of the Electric Vehicle Charging Association (EVCA), I write to express our strong support for the Energy Commission's proposed investment allocations for both light-duty electric vehicle charging infrastructure and medium- and heavy-duty zero-emission vehicles and infrastructure. Moreover, EVCA is in support of the investment plan's focus on zero emission vehicles (ZEV).

EVCA is a non-profit organization whose mission is to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the expeditious and efficient adoption of EVs and deployment of EV charging infrastructure. We work to expand clean transportation by promoting the continued growth of EV charging infrastructure, technology, and services. Our efforts are especially important in California, which maintains a majority of the nation's EV market and is investing in the expansion of related infrastructure.

Light-Duty Electric Vehicle Charging Infrastructure

The state has a goal to deploy 250,000 charging stations by 2025, including 10,000 DC fast chargers. Furthermore, it has a goal to deploy 5 million zero-emission vehicles by 2030, which will require significantly more infrastructure beyond the 2025 goal. EVCA strongly supports such ambitious deployment goals, but achieving them will be no small task. Given the CEC's assessment that the state is projected to fall short of its 2025 goal by approximately 80,000 stations, increased investments in and policy alignment among agencies is critical to minimizing this shortfall. EVCA thanks CEC for recognizing this gap and for its continuous allocation of funding to light duty EVSE.

Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure

Additionally, there is increased focus on medium- and heavy-duty vehicle (MDHVs) electrification. However, standardized and cost-effective infrastructure solutions

remain a key barrier to vehicle deployment. The state must research and develop technologies and strategies that minimize costs for fleet operators and prove scalable, cost-effective solutions that support widespread zero-emission MHDV deployment. EVCA thanks CEC for understanding the importance of MDHV infrastructure in its investment plan.

Furthermore, we recommend the Energy Commission use a portion of these funds to explore a CALeVIP-style program for MHDVs. CALeVIP is the optimal program design for accelerating EV charging deployment; its funds are easier to access, simplifying previously onerous administrative requirements that hampered EV charging companies' ability to participate in the program. Fleet operators and infrastructure providers would greatly benefit from a similar incentive program designed for MHDVs.

Conclusion

EVCA greatly appreciates the CEC's leadership in supporting zero-emission vehicle and infrastructure deployment; the Commission's legacy of innovation and support for these technologies has been critical to this industry's growth. The investment plan update significantly builds on this foundation and is strengthened by its focus on ZEV.

Thank you for your consideration,

A handwritten signature in blue ink, appearing to read 'Abdellah Cherkaoui', with a large, stylized flourish at the end.

Abdellah Cherkaoui
Chair of the Board
Electric Vehicle Charging Association