DOCKETED

Docket Number:	17-EVI-01
Project Title:	Block Grant for Electric Vehicle Charger Incentive Projects
TN #:	230732
Document Title:	Cory Bullis Comments - EVCA Comments on 2021 CALeVIP Project Regions
Description:	N/A
Filer:	System
Organization:	Cory Bullis
Submitter Role:	Public
Submission Date:	11/14/2019 8:51:00 PM
Docketed Date:	11/14/2019

Comment Received From: Cory Bullis
Submitted On: 11/14/2019
Docket Number: 17-EVI-01

EVCA Comments on 2021 CALeVIP Project Regions

Additional submitted attachment is included below.

Electric Vehicle Charging Association
INNOVATION FOR CLEAN MOBILITY

November 14, 2019

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

Re: 2021 CALeVIP Project Regions (Docket No 17-EVI-01):

Dear Commissioner Monahan and Energy Commission Staff:

The EV Charging Association (EVCA) appreciates the opportunity to provide comments on the Proposed 2021 California Electric Vehicle Infrastructure Project (CALeVIP) Incentive Project Regions which were presented on Oct 23, 2019. CALeVIP has provided a critical source of funding in support of reaching the state of California's ambitious ZEV goals.

EVCA is a non-profit trade association representing nine electric vehicle service providers (EVSPs), software and equipment manufacturers, and installation and maintenance providers. EVCA's mission is to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the adoption of electric vehicles (EVs) and deployment of charging infrastructure. Several of our member companies participate in CALeVIP as either the applicants or as a vendor. As such, EVCA respectfully submits the following comments:

1. **EVCA supports increased funding for the Greater Bay Area.**

EVCA is pleased to see the CEC focus more funding in the Bay Area, which has seen some of the highest EV penetration in the country. This high EV penetration necessitates increased charging investments, and as a result, EVCA supports funding for the Greater Bay Area, including the counties of San Francisco, Alameda, Contra Costa, and Marin. While adoption has steadily increased, there is still an abundant need for additional charging infrastructure, particularly in urban areas where infrastructure can be more costly and difficult to deploy.

2. **The Energy Commission should avoid the topic of LCFS in its infrastructure programs.**

EVCA was disappointed to see program requirements related to the forfeiture of LCFS for program applicants during the CALEVIP 2020 workshop. This topic was litigated during the

Sacramento project in 2019 and seemingly resolved after much stakeholder backlash. EVCA strongly recommends that this issue be avoided for the 2021 projects.

Removing LCFS greatly diminishes the value of the CALeVIP program and puts sites in CALeVIP at a competitive disadvantage to other sites that may be installed through other programs (e.g. settlement funds) that are allowed to keep LCFS. Electric vehicle service providers (EVSPs) rely on LCFS to keep operating costs low for customers, and forfeiting LCFS for each applicant will lead to increased costs for EV drivers.

3. **The Energy Commission should work on strengthening program requirements to ensure better queue management.**

EVCA applauds CEC for developing a first-come, first serve EV rebate program that will ensure rapid deploy of both Level 2 and DCFC throughout the state. However, EVCA is concerned that such low barriers to entry have led to an influx of reservations on day one that are speculative in nature rather than real, viable EV charging station projects. This will lead to many forfeitures in reservations, as has been evidenced by the Southern California project which was previously oversubscribed but now has capacity available.

To avoid such pitfalls, and to ensure that the reservations are "real" projects with a higher likelihood of moving through, CEC should strengthen program requirements. Additionally, EVCA asks that CSE provide regular updates on the queue, especially with early projects that are reaching their deadlines for energization, to obtain lessons learned to better manage the queue of applications for future projects.

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EVCA appreciates the CEC's consideration of these comments and for their leadership in accelerating the electrification of transportation within California. EVCA looks forward to future engagement and offers itself as a resource if any questions arise.

Sincerely,

Abdellah Cherkaoui
Chair
Electric Vehicle Charging Association