

DOCKETED

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GRID Alternatives Comments on SB 1000 Staff Workshop

See attached comments. Thank you!

Additional submitted attachment is included below.



June 18, 2020

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

VIA DOCKET

Energy Commission Docket 20-TRAN-02

Re: 20-TRAN-02 SB 1000 Electric Vehicle Charging Infrastructure Deployment Assessment

Dear Commissioners:

GRID Alternatives (GRID) submits the following comments in response to the discussion questions posed at the Senate Bill 1000 Electric Vehicle Charging Infrastructure Deployment Assessment Public Workshop. GRID strongly supports the Commission's efforts to increase access to electric vehicle infrastructure in all California communities, and specifically the Commission's focus on ensuring that low-income communities have equitable access to charging infrastructure, and is excited to help support these efforts. The discussion questions are below in bold, followed by GRID's responses.

Do you recommend other definitions, data sets, or identification methods for population income level, population density, or geographic area?

Using the State Median Income definitions for low-income communities fails to account for the wide variance in the cost of living between different parts of California - a gap that has increased tremendously in recent years due to the housing crisis. GRID recommends that the Commission explore using Area Median Income (AMI) data published annually by the US Department of Housing and Urban Development, which defines low-income as households earning less than 80% AMI in the county where they reside. These data sets account for both county-level variation in income levels, as well as household sizes, and have been used for decades by the state's affordable housing programs.

Are distribution and access the same?

This is a great question to ask - distribution and access are definitely not the same. The Commission's highlighting of different connector access types is a great example - a Tesla supercharger by the side of a highway in a low-income neighborhood may primarily be providing charging access to households passing through that neighborhood, more than providing charging access to the immediately surrounding community. So looking just at geographic data alone will not provide a full picture of charging access in low-income communities.

Do you have recommendations for measuring charging infrastructure distribution and access?

One critical way of bridging this gap is to pair geographic analysis with talking with actual low-income consumers, including both actual EV drivers and prospective EV drivers, to find out where they actually charge their vehicle, or where they feel like they could charge their vehicle. In GRID's community engagement work through the CARB One-Stop-Shop Pilot Project and other low-carbon transportation equity programs, we have found that many sociological barriers to public charging exist for low-income households that would not be obvious from a pure data perspective. The One-Stop-Shop Pilot Project could be one vehicle for helping the Commission gather some of this information.

Are there other indicators for deployment that we should evaluate?

Low-income renters have particularly high barriers to adopting electric vehicles, since they both have lower financial resources to purchase an electric vehicle, and also are typically unable to install a home charger. GRID recommends that the Commission look at publicly available housing stock data to identify areas with disproportionately high concentrations of low-income renters.

Thank you for the opportunity to provide input on this important research project. GRID is happy to discuss these topics further anytime, and looks forward to continuing to support the Commission in our shared efforts to ensure that low-income Californians have robust and equitable access to electric vehicle charging infrastructure.

Sincerely,



Zach Franklin
Chief Strategy Officer
GRID Alternatives