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*Comment Received From: Cory Bullis*  
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**EVCA Comments on CEC VMT IEPR Workshop**

*Additional submitted attachment is included below.*



## Electric Vehicle Charging Association

INNOVATION FOR CLEAN MOBILITY

July 3, 2020

Ms. Patricia Monahan, Commissioner  
California Energy Commission  
1516 Ninth Street, MS-33  
Sacramento, CA 95814

### **Re: EVCA Comments on Vehicle Miles Traveled (VMT) Integrated Policy Energy Report Workshop**

Dear Commissioner Monahan,

On behalf of the Electric Vehicle Charging Association, thank you for the opportunity to comment on the Commission's workshop, "Vehicle Miles Traveled, Workshop on Transportation Trends and Light-Duty Zero-emission Vehicle Market Update" as part of the 2020 Integrated Energy Policy Report (IEPR) update.

EVCA is a non-profit trade association representing eleven electric vehicle service providers (EVSPs), software and equipment manufacturers, installation and maintenance providers, and an autonomous and electric ridesharing fleet operator. Our members include ABM Industries Inc., Blink Charging, BTCPower, ChargePoint, Clean Fuel Connection, Cruise, EVBox, EV Connect, EVgo, FLO, Noodoe, and Volta. 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 EVs and deployment of charging infrastructure.

We appreciate the Commission's efforts to better understand and address the state's VMT trends based on their connection to energy and environmental goals.

Transportation electrification remains a key area of focus to achieving such goals. Electrifying ridesharing applications and other light duty fleets also provides a win-win opportunity to further both the state's EV deployment and emission reduction efforts. Therefore, we'd like to submit the following comments for your consideration:

- 1. Transportation electrification and related infrastructure investments should remain a priority in the face of rising gas-powered VMT.**

During the workshop, University of California, Berkeley Institute of Transportation Studies shared that VMT has steadily risen since researchers first started collecting data on it in 1971. Even with a significant reduction in statewide VMT due to local and state mandates to quarantine, they noted that as state economies reopen, VMT is likely to increase once again.

Given this, panelists emphasized, and EVCA agrees, that transportation electrification must remain a key priority for the Commission. While we understand the Commission's interest in encouraging modeshift, EVs still remain a key tool to reducing emissions from the transportation sector. The EV and EV charging markets have yet to reach critical inflection points to enable economies of scale, mass deployment, and truly cost-competitive offerings compared to gas-powered vehicles. The Commission's work to date funding EV and EV charging deployment through its Clean Transportation Program (CTP) have been instrumental in growing the market, and sustained funding to light-duty infrastructure investments will be necessary for the duration of the CTP<sup>1</sup>. Additionally, there is further space for growth. Thus, EVCA strongly encourages the Commission to continue to leverage CTP funds to continue spurring EV charging station deployment for the duration of the CTP in both the light duty and medium-heavy duty sectors.

## **2. The Commission should focus on increasing “passenger miles traveled.”**

Not all miles traveled are equal in how they impact the state's climate and environment. Increasing gas-powered “vehicle miles traveled” (VMT), which is the measurement of the number of miles driven by all the cars on the roads, is the primary culprit exacerbating the state's climate crisis from the transportation sector.

Ridesharing is well-understood as a key strategy to reduce transportation emissions; these emission benefits are multiplied if these vehicles are also electrified. While the state has focused on increasing and electrifying public transit a primary ridesharing strategy, the private sector has also been innovating and deploying new electric ridesharing solutions – including microtransit, ridesharing services through transportation network companies (TNCs) and charter party carriers (TCPs), and micromobility options. These options have the potential to increase “passenger/person miles traveled”(PMT), a measure that can yield both mobility and environmental benefits.

EVCA respectfully recommends the Commission to clearly differentiate between PMT and VMT, and furthermore, differentiate between gas-powered VMT and electric VMT (eVMT) through its IEPR. Delineating the difference between these types of VMT will more clearly define the problem the state should focus on – increasing PMT and reducing gas-powered VMT. Once defined, then the Commission can more specifically tailor goals and the supportive policies that align with statewide emission reduction and increased mobility goals.

## **3. The Commission should develop an infrastructure deployment strategy to specifically support electric ridesharing fleets.**

The CTP is a landmark program that has supported the research, development, and deployment of EV charging infrastructure. Furthermore, the Commission's electric

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<sup>1</sup> The CTP phases out funding for light-duty charging infrastructure in 2023, which is a detriment to these high-VMT use cases.

vehicle infrastructure projections (EVI-PRO) model helps show infrastructure deployment needs between now and 2025 across the state. Through this work, we have seen the Commission target infrastructure deployment at specific locations and geographies, and EVCA supports the Commission's effort to develop targeted solicitations and strategies to encourage medium- and heavy-duty vehicle electrification. However, a similar need exists for ridesharing fleets, including both TNCs and TCPs.

The passage of the Clean Miles Standard (SB 1014, 2018) will be critical to spurring the electrification of TNCs over the next decade, necessitating large-scale investments in DC fast charging infrastructure; furthermore, TCPs are electrifying as well. These ridesharing operators also need focused support from the Commission to deploy infrastructure that will support their charging behaviors. By developing a more comprehensive ridesharing charging infrastructure deployment strategy, the Commission will help further incentivize the deployment of EVs, which will only further help achieve industry-wide economies of scale. Implementation of the Clean Miles Standard is set to begin in 2023, meaning that large scale infrastructure investments will be necessary throughout the duration of the CTP to support electrification of this sector.

Thank you for your consideration,

A handwritten signature in blue ink, appearing to read 'A. Cherkaoui', with a large, sweeping underline.

Abdellah Cherkaoui  
Chair  
Electric Vehicle Charging Association