

DOCKETED

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Project Title:	Block Grant for Electric Vehicle Charger Incentive Projects
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Docket Number: 17-EVI-01

CALeVIP Incentive Program-Docket No 17-EVI-01

Additional submitted attachment is included below.



City of Millbrae
621 Magnolia Avenue, Millbrae, CA 94030

REUBEN D. HOLOBER
Mayor

ANN SCHNEIDER
Vice Mayor

ANNE OLIVA
Councilmember

GINA PAPAN
Councilmember

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Councilmember

July 28, 2020

Commissioner Patricia Monahan
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Docket No. 17-EVI-01

Commissioner Monahan:

The City of Millbrae (City) strongly supports the Energy Commission's selection of San Mateo County for the upcoming solicitation of the CALeVIP Incentive Program. CALeVIP has been critical to advancing state infrastructure goals to support transportation electrification. We commend the Energy Commission's leadership in electric vehicle (EV) infrastructure investment.

The City has installed thirteen EV chargers to date, including ten dual Level 2 chargers and three DC fast chargers, and is looking forward to participating in the upcoming CALeVIP program to install additional chargers to enable transportation electrification for our residents, visitors, and commuters passing through. The City's Climate Action Plan includes continuing to build our EV infrastructure through a variety of measures.

With our current EV charging stations, and especially in light of current budget constraints that are impacted by COVID-19, the City is looking primarily to install EV charging stations through partnerships with third parties where the third party purchases and maintains the DC fast chargers. It is a common practice for the third party charging network, not the City, to be the applicant of record.

It has come to our attention that this preferred model of participation may be challenged by the proposed applicant cap of \$720,000, which will only be sufficient to fund 2-3 sites per provider. Despite a total DCFC allocation of \$12MM for San Mateo County, this low cap makes it likely that the program will run out of funding before the City is able to get a reserved allocation through its preferred third party partner. This is an inherent challenge with the applicant caps, especially in the DCFC space, where the owner-operator model is most prevalent.

Moreover, the applicant cap for San Mateo with a funding allocation of \$12MM is the same as for territories in the same program where the funding allocation is limited to \$6MM. We respectfully request that the Energy Commission consider scaling the cap with the size of the allocation per territory so that it is brought in line percentage wise with the caps applicable in other counties like Santa Clara County.

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Considering the above, it limits the opportunities for cities to work with third party providers in the DC fast charging space and may therefore unintentionally exclude organizations that do not have the operational, budgetary or legal ability to participate directly. We therefore urge the Energy Commission to increase the cap in advance of the upcoming solicitation and appreciate the opportunity to provide feedback.

Sincerely,



Shelly Reider
Environmental Programs Manager
