

**DOCKETED**

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## **CALeVIP Project Designs**

*Additional submitted attachment is included below.*



## **Comments to CEC Docket 17-EVI-01**

### **Sonoma Clean Power Comments on Proposed Design Changes to CALeVIP**

Sonoma Clean Power (SCP) respectfully submits these comments on the California Energy Commissions (CEC) proposed design changes to the California Electric Vehicle Incentive Project (CALeVIP).

#### **Regarding CALeVIP Equipment Requirements: Tesla**

SCP does not support adding Tesla connectors as eligibility for CALeVIP funds. We believe the Commission and public funding partners should not be incentivizing a proprietary connector that can only be accessed by one vehicle brand. No adapter currently exist that allows non-Tesla vehicles to charge with Tesla connectors. On the other hand, Tesla vehicles can utilize J-1772 connectors and CHAdeMO connectors with adapters.

#### **Regarding CALeVIP Equipment Requirements: Connectors**

SCP supports the proposed change from the current requirement that every charger must have both 1 CCS and 1 CHAdeMO connector to one where each location must have a minimum of 1 CHAdeMO connector and at least 50% of rebated connectors must be CCS connectors.

SCP supports this proposal as a way to simplify and standardize vehicle charging around CCS. The vast majority of EV models on the market currently utilize CCS over CHAdeMO to charge and some EV models, such as the 2020 Kia Soul, have shifted from utilizing CHAdeMO to CCS. Additionally, companies like Nissan, which historically have used CHAdeMO in their electric vehicles (Nissan Leaf), have announced CCS support for their new EVs, such as the Nissan Ariya.

Additionally, the California Air Resources Board has proposed making CCS 1 the standard port for all EV models across California, projecting that by 2022, 51 EV models will utilize CCS while only two EV models will utilize CHAdeMO. Making at least 1 CHAdeMO connector available will allow current EVs that utilize that port to continue to charge.

While we admire the CEC's proposal for allowing greater flexibility and cost-effectiveness in DCFC projects, we do not support unilaterally enacting the proposed change in DCFC requirements for *current* CALeVIP projects that are accepting applications or are processing applications. We rather want to see the Commission allow current projects the ability to work with the project administrator, if they so wish, to change their applications to fit within the proposed changes.

The projects were launched and applications were accepted with an understanding of the project rules and changing those after applications have been accepted and processed will lead to applicant confusion, major disruption to projects with the potential for cancellations, and a bad project participation experience. However, if an applicant for current projects wishes to install mostly CCS, we support giving them the ability to do so.

Giving future applicants the ability to install more CCS connectors will allow for greater utilization by the vast majority of EV drivers while maintaining support for CHAdeMO. This will allow for more charging options by potentially enabling concurrent dual charging and power sharing and why we support Peninsula Clean Energy's request for



this proposed change to be implemented for future and soon-to-be launched projects.

**Regarding Better Serving Priority Populations**

SCP supports increasing the minimum DAC/LIC investments to 35% from the current 25%. Our disadvantaged and low-income communities have historically been left out and increasing investments will help ensure the transition to electric transportation is accessible by our community members.

While we support the idea of allowing employment centers in non-disadvantaged or low-income communities to qualify, we have concerns about how the Center for Sustainable Energy will calculate AMI of employees to determine eligibility. Employers of low-income members may be hesitant to release that type of information to applicants or CSE complicating qualification efforts. We welcome more information, details, and alternative options on the qualification efforts.