

DOCKETED

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Comments of Joint Parties on CALeVIP Proposal

Please see attached document.

Additional submitted attachment is included below.



Date: October 1, 2020

To the attention of: Commissioners David Hochschild, Chair; Patricia Monahan; Janea Scott; Karen Douglas, and Andrew McAllister

In reference to California Energy Commission docket number 17-EVI-01

California Energy Commission Commissioners:

Environmental Defense Fund and Sierra Club California (Joint Parties) offer the following brief comments on the recent CALeVIP Project Design Workshop that took place on September 17, 2020. More specifically, the Joint Parties address the proposal brought forth in that workshop to expand eligibility for funding to Tesla connectors for both Level 2 and DC fast chargers.

Joint Parties have concerns with the proposed approach, as it may undermine the equitable distribution of public funding and frustrate the achievement of the state's equity and air quality goals. Expanding CALeVIP eligibility and public funding will provide unnecessary support to an already well-funded company and its generally wealthy customers, that would use that funding to exclusively serve their customers that would have been able to purchase a Tesla vehicle notwithstanding this intervention. In order to clean up transportation in areas disproportionately burdened by harmful levels of air pollution and meet state equity goals, it is imperative that publicly-funded programs prioritize the deployment of electric vehicles in low-income and disadvantaged communities. Unfortunately, this proposal would provide a significant subsidy to drivers who are already more likely to purchase an electric vehicle at the expense of low-income and disadvantaged drivers across the state. Given that Tesla already has a significant stake in the light-duty market and is going to play a potentially large role in the medium- and heavy-duty space as well, this proposal will only serve to exacerbate this disconnect.

As well, it is critical to note that this proposal will not benefit owners of any other electric vehicles, as no connector is available to allow owners of, for the sale of argument, a Nissan Leaf to "fuel up" at a Tesla proprietary charging station. While there could be merit in expanding eligibility to Tesla if it were required to open access to their network, it is problematic to give this public money to Tesla without strings attached. Simply put, the investment of public funds should come with a concomitant public obligation to ensure equitable access for visitors wanting to use these stations — public funds should not be used to deploy stations part of a proprietary network from which a significant portion of the public would be locked out. As shown by Tesla technology capability in Europe, accommodations to allow greater compatibility are possible. Moreover, allowing Tesla - which doesn't abide by proposed interoperability standards - to receive public funding will result in sites that are not fully future proofed, and that fail to consider other agency processes, like the California Public Utilities Commission Transportation Electrification Framework.

Rather than move forward with the Tesla proposal, the Energy Commission should instead ensure any publicly funded asset is brand neutral and equipped with an industry-recognized standard connection (e.g., SAE J1772) to ensure all EV owners can benefit from this investment. Until technology exists to allow interoperability between non-Tesla and Tesla charging stations – and the CALeVIP program is providing funding for that technology – Joint Parties respectfully request that the Energy Commission table this proposal in the interest of providing a more equitable transition to vehicle electrification. In the event that the Commission does move forward with this proposal, Joint Parties believe a requirement for Tesla to restrict deployment to underserved and disadvantaged areas – or spend an amount commensurate to the funding from this program in those communities – is necessary. Regardless of the pathway, at least one further workshop to explore a proposal that could have significant consequences on the future of transportation and how it relates to an equitable transition.

Respectfully submitted,

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