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EVCA Comments on CALeVIP Program Changes

Additional submitted attachment is included below.

Electric Vehicle Charging Association
INNOVATION FOR CLEAN MOBILITY

October 1, 2020

Mr. Brian Fauble
Energy Commission Specialist II
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: EVCA Comments on CALeVIP Design Workshop

Dear Mr. Fauble,

On behalf of the Electric Vehicle Charging Association (EVCA), thank you for the opportunity to comment on potential programmatic changes to the Energy Commission's (CEC) design of the California Electric Vehicle Infrastructure Voucher Incentive Project (CALeVIP). To achieve Governor Newsom's recent executive order to require 100 percent of new passenger vehicle sales to be zero-emission by 2035, the state must redouble its efforts to rapidly scale the deployment of charging infrastructure. While CALeVIP's focus is to increase market competition by facilitating widespread charging deployment, the program needs additional changes to increase these outcomes. Increasing charging deployment and promoting innovation through expanded access to well-designed charging infrastructure programs will further stimulate private investment in the industry. Together, these forces can bring down overall costs, further serving deployment. With these goals in mind, we offer the following recommendations on programmatic changes to CALeVIP.

1. **Institute gating requirements to reduce the applicant attrition rate.**

CALeVIP maintains low barriers to entry for applicants, leading to high attrition rates because of the speculative nature of many projects. Many regions "sell out" of funds rapidly, as recently evidenced by the Sonoma project, locking up funds for months or even an entire year. This ultimately does not support market scale-up because funds become reserved but don't follow through supporting actual deployment. Therefore, more shovel-ready projects are locked out of incentives, slowing down overall deployment. EVCA respectfully recommends the CEC survey other incentive programs across the country, especially for DCFCs, to learn best practices for

minimizing attrition rates and prioritize shovel-ready projects. Further, CALeVIP program administrators should be more transparent regarding attrition within the program.

2. **Expand eligibility of CALeVIP incentives to companies providing infrastructure to support automated vehicle (AV) fleets and transportation network companies (TNCs).**

CALeVIP should be more inclusive of infrastructure deployment strategies and business models, including infrastructure that serves electric AV fleets and TNCs. Under CALeVIP's current rules, while many ride-hailing fleet applications are allowed in the Level 2 (L2) space, these business models - including shared electric AV fleets - are ineligible in the DCFC space. While these future AV fleets will exclusively serve the public, the private nature of the chargers make these models ineligible. Given the potential benefit that shared electric fleets present for California's clean transportation goals, EVCA recommends the CEC adjust parameters of existing programs to reflect that these technologies - while not offering the public access to fleet chargers themselves - provide the public with clean transportation and direct access to green miles. This change will enable the CEC to capitalize on some of the tangible benefits of this technology - including rapid deployment, high charger utilization, and even grid benefits.

3. **Adjust 24/7 accessibility requirements in dense urban areas to increase deployment.**

Currently, CALeVIP requires chargers to be accessible to the public 24/7. However, in many dense urban areas of the state, locations capable of providing 24/7 accessibility remain sparse, as surface lots are less common in the urban core than more suburban and rural areas. Cities' urban cores desperately need more public charging stations due to a high percentage of residents living in multi-unit dwellings that rely upon on-street parking. However, many potential urban charging station locations are in mixed use developments that may be closed to the public for short windows (e.g. 12 AM to 6 AM or similar hours that see little to no use of public charging with or without night gate restrictions). Thus, this requirement unnecessarily excludes viable projects in parts of the state most in need of charging resources.

Alternatively, the Bay Area Air Quality Management District's EV charging incentive program requires chargers to be accessible during normal business hours and at least 250 days a year. EVCA respectfully requests the CEC to acknowledge the limitations of dense urban locations and adjust these accessibility requirements accordingly.

4. **Require submission of the site verification form at time of filing the application.**

EVCA applauds the CEC for its focus on further streamlining the application review process to increase charging deployment. The CEC's proposal to require applicants to submit the site verification form one to two days after filing an application supports this goal; however, EVCA believes the CEC should take this one step further by instead requiring the form at the point of application submission. The CEC should condense the application process as much as possible and requiring this form at the point of application submission does not create undue burden on applicants. Further, it will demonstrate that locations have site control before they submit an application.

5. **EVCA supports requiring applicants securing a permit within six months of application for Level 2 stations as well as the voluntary invoicing template.**

For the reasons stated above in item 4, EVCA supports these changes as it will help further streamline the application review process and condense the timeline to receive funds. EVCA has no position on the 11-month review for DCFC and defers to members' individual comments.

6. **Ensure fairness and competition by allowing an even playing field among business models.**

EVCA supports CALeVIP's goal of incentivizing market scale-up through promotion of a multitude of charging infrastructure solutions. This competition further promotes innovation and investment in the marketplace. However, CALeVIP could benefit from further programmatic changes that promote more inclusivity, competition, and fairness among various companies' business models.

7. **Should the CEC make Tesla connectors eligible for incentives, the total amount of incentives Tesla connectors can receive should be capped at 10 percent.**

While EVCA commends the CEC requiring Tesla connectors to also have CHAdeMO and CCS connectors on site, the CEC should limit the percentage of Tesla connectors or Tesla-manufactured equipment that can be deployed as part of the program. EVCA is concerned that Tesla could absorb a disproportionate amount of state funds in support of infrastructure that would only be compatible with one vehicle make. EVCA recommends that Tesla connectors be capped at no more than 10 percent of the funding available through each individual funding round.

8. **EVCA supports only requiring 1 CHAdeMO connector per site. For sites of four or more chargers, the CEC should require 75 percent to be CCS.**

EVs in California more commonly use CCS connectors compared to CHAdeMO ones. Given this, EVCA thinks the CEC's proposal to require a CHAdeMO connector per site instead of per charger is pragmatic. This will allow companies to conserve resources and reallocate it to other uses to increase charging deployment. EVCA does not think this shift will create an undue impact on EVs that rely on CHAdeMO connectors. Furthermore, EVCA respectfully recommends the CEC further require sites of four or more connectors to be 75 percent CCS, as it will further drive the market to standardized, widespread infrastructure solutions that bring down costs across the entire industry.

9. **EVCA supports the incentive adder for multi-unit dwelling and rural in the Level 2 space.**

To bolster Level 2 deployment in rural areas and multi-unit dwellings, EVCA supports the CEC's increases in incentive levels for these locations.

10. **Require Electric Vehicle Infrastructure Training Program (EVITP) certification no earlier than January 1, 2022.**

Assembly Bill 841 (Ting), which is on the Governor's desk awaiting his signature, would mandate EVITP certification as a condition of accessing EV charging incentives beginning January 1, 2022. EVCA, along with other critical industry stakeholders, worked extensively with Assemblymember Ting and the bill's sponsor to push out the implementation date for EVITP for three key reasons.

First, the charging industry needs time to prepare for EVITP certification and integrate it into their operations. Companies need to adjust their timelines and planning cycles while they work with their contractors to get them certified. EVCA does not see a meaningful benefit to requiring EVITP certification by September 2021, when the charging industry and labor groups came to an agreement to require this starting January 2022.

Second, there are critical gaps in EVITP's curriculum that need to be addressed, particularly concerning DCFCs. Once again, EVCA worked with Assemblymember Ting and AB 841's sponsor to specify that the CEC should conduct workshops to ensure gaps in curriculum for DCFCs be addressed and integrated. This process will take time, and regardless of whether the Governor signs AB 841, the CEC should work with EVITP to fix this shortfall. Otherwise, the CEC will have instituted a training requirement that doesn't cover all charging market segments.

Third, it remains to be seen that EVITP training infrastructure is widespread, accessible, and that the online course is operating smoothly. EVCA is concerned by the lack of accessibility of EVITP's training infrastructure; most locations are concentrated in the Bay Area and LA

County and there are no locations north of Sacramento. EVCA is encouraged by EVITP's announcement to have online courses, especially given COVID-19 considerations, however, those courses have yet to start, and will likely require refinements to ensure smooth operation. **Therefore, EVCA also respectfully recommends that as long as the CEC requires EVITP, it should also require EVITP to offer online courses to maintain accessibility to contractors**. Furthermore, EVCA advocated for 3rd party administrators to have the ability to administer training across the state, which AB 841 specifies. Requiring EVITP certification in January 2022 will give EVITP more time to expand its training infrastructure and improve the operation of its online operations. These considerations are extremely important to the industry to ensure proper access to training and protect against unduly slowing charging deployment.

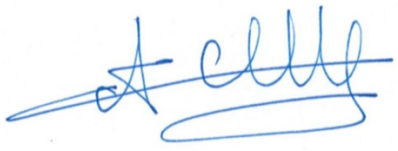
11. **Do not require contractors to be listed on EVITP's website in order to be eligible for the program if they are able to provide a certificate of completion.**

Without any guarantee that EVITP is updating their website with certified contractors, this should not be a requirement for contractors. It is sufficient that contractors provide a copy of their certification.

12. **EVCA supports increasing the amount of funding that deploys chargers in disadvantaged communities.**

EVCA strongly supports equity in accessing charging stations across diverse communities, including low-income and disadvantaged communities. The success of widespread transportation electrification depends on making EVs and charging stations accessible to all communities. Therefore, EVCA supports this change.

Thank you for your consideration,



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