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GRID Alternatives Comments on CALeVIP Project Design Workshop

Please see the attached document for GRID Alternatives' comments on the September 17th CALeVIP Project Design Workshop. Thank you for your consideration!

Additional submitted attachment is included below.



October 1, 2020

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

VIA DOCKET

Energy Commission Docket 17-EVI-01

Re: 17-EVI-01 Block Grant for Electric Vehicle Charger Incentive Projects

Dear Commissioners:

GRID Alternatives (GRID) submits the following comments regarding the CALeVIP Project Design Workshop on September 17, 2020. We are responding to the Commission's request to provide input regarding staff proposals for Better Serving Priority Populations in CALeVIP. GRID strongly supports the Commission's efforts to consider additional ways that CALeVIP projects can ensure that low-income households have equitable and robust access to electric vehicle charging infrastructure, and is pleased to offer some specific suggestions of proven, practical strategies to achieve these goals within the CALeVIP framework.

I. CALeVIP Funding Minimums for Priority Populations Should Incorporate Household-Level Eligibility Criteria

GRID supports the Commission's proposal to increase the minimum investment levels for priority populations on CALeVIP projects to 35%.¹ In order to make sure that these minimum investments successfully achieve the Commission's goals for serving lower-income households and other priority populations, the eligibility criteria for these minimum investment levels should incorporate household-level criteria for the actual end-users of the proposed charging infrastructure.

Geographic criteria for equity investments, such as requirements that projects be physically located in CalEnviroScreen Disadvantaged Communities (DACs) and/or Low-Income Community (LIC) census tracts², do not by themselves mean that those projects will offer significant access to low-income households or other priority populations. Given the substantial economic and practical barriers to purchasing electric vehicles faced by low-income households, many public chargers in DAC/LIC census tracts often still primarily serve higher-income drivers, such as those who work in those communities, or regularly pass through these communities, but live elsewhere. In a worst-case scenario, GRID has

¹ CALeVIP Design Workshop staff presentation, p. 27.

² As defined per AB 1550, <https://ww3.arb.ca.gov/cc/capandtrade/auctionproceeds/lowincomemapfull.htm>

heard concerning feedback from grassroots environmental justice organizations that public chargers are often seen as promoting "green gentrification". Green gentrification is the displacement of longtime low-income residents through infrastructure investments that are seen as primarily providing benefits to higher-income households from elsewhere who may be seeking out lower-cost housing opportunities.

In order to ensure benefits to priority populations, and avoid unintended consequences, the Commission should pair geographic criteria for its minimum equity investments with criteria that ensure that the end users of this infrastructure are themselves low-income residents. The challenge then becomes how to create criteria for CALeVIP projects that provide funding to organizations (site hosts, developers, etc.) and not to individual households. This is where looking at other existing equity programs can serve as a helpful roadmap for the Commission.

II. CALeVIP Can Ensure Benefit to Priority Households by Targeting Affordable Housing and Tribal Lands

The most obvious equity criteria available to ensure benefits to priority households would be to target some or all of the equity funding in CALeVIP specifically to multifamily affordable housing complexes, that are defined explicitly by statute and regulation to exclusively serve income-qualified low-income tenants. GRID recommends that the Commission follow the lead of the California Public Utilities Commission's [SOMAH \(Solar on Multifamily Affordable Housing\) incentive program](#), which has spent years developing technical criteria and program structures to ensure that clean energy subsidies to property owners lead to real, measurable economic benefits for low-income households. At a minimum, we recommend that the Commission use the same [legal definition of multifamily affordable housing used by the SOMAH program](#). SOMAH defines eligible multifamily affordable housing as deed-restricted low-income residential housing complexes of at least five units, that satisfy one of the following criteria:

- 80 percent of property residents have incomes at or below 60 percent of the area median income (AMI)
- Property is located in a defined disadvantaged community (DAC) that scores in the top 25 percent of census tracts statewide in the CalEnviroScreen

Alignment with SOMAH can also facilitate outreach and education for the Commission, by facilitating collaboration with the SOMAH program administrators to offer affordable housing sites the opportunity to pair solar subsidies with subsidies for charging infrastructure, particularly on projects such as solar carports where there are natural project and cost efficiencies between the two technologies.

Another sector that can be targeted to ensure benefits to priority populations are projects located on federally recognized tribal lands. Unfortunately, only 5 of California's 107 federally-recognized tribes have reservation land that overlaps with CalEnviroScreen Disadvantaged Communities map. The good news is that, like with affordable housing, there are existing programs that are designed to address this inequity that can be leveraged by the Commission to create rules and frameworks for targeted

investments in tribal projects. For example, the California Air Resources Board's [Clean Mobility Options Voucher Pilot](#) for shared clean mobility equity projects explicitly created criteria to set aside funding for tribal projects, with geographic criteria that is much more expansive than CalEnviroScreen Disadvantaged Communities. Clean Mobility Options also presents another opportunity for coordinated outreach if CALeVIP elects to pursue dedicated funding for tribes.

III. Rules for Minimum Investments for Affordable Housing Properties and Tribal Lands Should be Designed with the Needs of these Sectors in Mind

When designing minimum investment criteria for priority populations, the Commission should take into account not only the financial needs of sectors such as affordable housing and tribes, but also the practical day-to-day constraints faced by these sectors in order to successfully implement charging projects. This is informed by GRID's direct experience with affordable housing owners and tribal nations throughout the state. In particular, both sectors would benefit from maximum flexibility in terms of the amount of time allotted to CALeVIP recipients to fully expend the awarded funds.

For example, affordable housing developers often prefer to integrate charging infrastructure deployment into the new construction or substantial rehabilitation of the entire housing complex, when construction is already going on and tenants are not living on-site. However the construction timelines for these projects are long and complicated, and limited by the requirements of many other federal, state and local government programs used to support affordable housing. At a minimum, providing CALeVIP recipients in these sectors the extra time available to DC Fast Charging beneficiaries, even when installing Level 2 chargers, would provide greatly needed flexibility and help ensure that these projects are successful.

Thank you for the opportunity to provide input on this exciting and much-needed equity program. We look forward to collaborating with the Commission to ensure that low-income Californians have robust and equitable access to electric vehicle charging infrastructure.

Sincerely,



Zach Franklin
Chief Strategy Officer
GRID Alternatives