

DOCKETED

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Additional submitted attachment is included below.

October 5, 2019

Vice Chair Janea Scott
California Energy Commission
1516 9th Street, MS-32
Sacramento, CA 95814 -5512

SUBJECT: Docket No. 17-EVI-01

Dear Vice Chair Scott,

I write to express the City of Sacramento's strong support for the Energy Commission's ongoing investment in the California Electric Vehicle Infrastructure Project (CALeVIP). Programs like CALeVIP are critical to advancing electric vehicle (EV) deployment to achieve both state and local goals. We commend the Energy Commission's leadership in EV infrastructure investment.

The City of Sacramento is committed to become the "Zero-Emission Vehicle Capital of California." Our adopted goal is to achieve 75,000 zero-emission vehicles (ZEVs) in Sacramento by 2025, representing our contribution to Governor Brown's goal of 1.5 million ZEVs statewide by 2025. The City is currently pursuing CALeVIP rebates at eight City facilities, with more sites expected in coming months. This first wave of applications allowed the City to install 103 new and replaced Level 2 connectors, which would not have been financially feasible without the CALeVIP funds. Most applications have been approved and we are waiting to receive the final payments.

The City of Sacramento has learned many lessons through our participation in the Sacramento County Incentive Project to date. Through this experience, we respectfully offer the following feedback:

- **The City does not support the proposal to include additional checkpoint reviews for Level 2 installations. Instead, the California Energy Commission (CEC) and Center for Sustainable Energy (CSE) should work to simplify the current process for applicants.** The existing process does not seem well suited for municipalities and/or organizations applying for multiple project sites. Local governments have long served as leaders providing public EV charging infrastructure and are critical partners for meeting the state's EV infrastructure goals. Yet the onerous program requirements are not well suited to local government processes, and may serve as a significant disincentive to public agency participants. We are also concerned at how cumbersome the process was for participation, even with the City's extensive experience delivering EVSE projects, implementing grants, and securing rebates. If the process was challenging for us to participate in with our strong background, the process is likely infeasible for many other agencies or entities with far less experience. The current process is overly complex and extremely onerous, often making participation difficult, inconsistent, or confusing. For example:
 - Repeated breakdowns in communication (between applicant and CSE, as well as between SMUD and CSE).

- Inconsistent review of documents between program staff for our multiple applications, or changes in direction that required extensive coordination and dedication of City staff time to meet program requirements.
- Timelines for review at each stage were not clearly communicated, causing issues with budgeting cycles.
- CSE's integration with SMUD processes is still being developed, creating more work for applicants and requiring more time for CSE review, further challenging project timelines and internal deadlines for reimbursement.
- **The City supports the proposal to increase the minimum investment in disadvantaged and low-income communities to 35%.**
 - There continues to be a disproportionate need for EVs and EV charging infrastructure in disadvantaged and low-income communities. Increased investment is crucial for more equitable implementation and EV adoption.
 - Expanding EV infrastructure into new communities where it is lacking requires involvement of new partners to host and deploy chargers. Recognizing that the next wave of participants in these communities likely has far less experience with EVSE than those operating EVSE to date, we think it is even more critical for the CSE to simplify the application process.

We commend the CEC's strong leadership and forward-thinking reinvestment of revenue into the program. We applaud SMUD and the Energy Commission for partnering with the goal of accelerating the EV charging market in Sacramento. We simply wish to ensure successful realization and believe that simplifying the program would increase participation among large and small organizations, and support important goals for EV charging access in disadvantaged communities.

Thank you for your consideration and the opportunity for input. We would be happy to discuss any of the points above in more detail if useful.

Sincerely,



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