DOCKETED	
Docket Number:	20-TRAN-04
Project Title:	Electric Vehicle Infrastructure Project Funding
TN #:	236251
Document Title:	EVCA Comments CEC Light Duty Infrastructure Allocation
Description:	N/A
Filer:	System
Organization:	Natalie Vergara
Submitter Role:	Public
Submission Date:	1/8/2021 4:17:34 PM
Docketed Date:	1/8/2021

Comment Received From: Natalie Vergara
Submitted On: 1/8/2021
Docket Number: 20-TRAN-04

EVCA Comments CEC Light Duty Infrastructure Allocation

Additional submitted attachment is included below.

Electric Vehicle Charging Association
INNOVATION FOR CLEAN MOBILITY

January 8, 2021

Mr. Matt Alexander
Ms. Sharon Purewal
Ms. Jennifer Allen
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: EVCA Comments on the CEC's "Light-Duty Infrastructure Allocation" Workshop

Dear Mr. Alexander, Ms. Purewal, and Ms. Allen,

Thank you for the opportunity to comment on the Energy Commission's (CEC) proposed funding concepts for multi-unit dwellings (MUDs), advanced technologies, and advanced charging projects.

The Electric Vehicle Charging Association (EVCA) is a not-for-profit trade organization of thirteen leading electric vehicle (EV) charging industry member-companies. EVCA's mission is to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the expeditious and efficient adoption of EVs and deployment of EV charging infrastructure.

Below, EVCA has detailed suggested modifications to the concepts presented in the December workshop.

1. **EVCA supports proposal 2c: alternative to "Home Charging", including public charging, "that can act as a viable and reliable alternative to conventional home charging will provide the security and confidence for drivers to make the transition to EVs."**

EVCA agrees conceptually with proposal 2c, which includes high-powered chargers and downtown core curbside charging as a viable alternative to conventional home charging, for a number of reasons. First, public charging can serve a wide array of EV drivers. EVCA recommends that curbside charging be one eligible site location, but other commercial site host options should be available as well to serve this market segment, similar to the CALeVIP program which has multiple eligible site host categories.

Governor Newsom's executive order creates a renewed imperative on the state and industry to rapidly scale up charging deployment to meet this mandate. Many downtown cores, per the CEC's own estimates, lack larger and more accessible parking lots that are ideal to deploy

stations at. Given this, public charging is a viable alternative to serve these areas' growing needs. It serves a broader market need because it's useful both as an alternative to residential charging and provides an amenity to shoppers at many commercial locations while drivers run their daily errands. Public charging can be deployed in most, if not all, downtown locations, allowing many cities and electric vehicle service provider (EVSP) business models to benefit, as opposed to only a limited set of stakeholders.

Given limited funding, we believe the CEC must prioritize the larger challenges of the market, which remain economies of scale and cost competitiveness. Specific use cases and specialized charging technologies, such as plug and charge, robotic charging, and some of the other high tech concepts suggested by the CEC, while important, are not likely to serve the larger needs of the market and help address gaps.

Focusing on downtown cores also provides an important equity benefit. Many lower-income households, particularly renters, live in MUDs[1]. Given the difficulty and lack of speed in deploying stations at MUDs, public charging in downtown cores can help close this gap because one charging station can serve thousands of EV drivers, enabling widespread access.

As the CEC considers focusing on public charging, we recommend it should include **both conventional and high-powered chargers for *both Level 2 stations and DCFCs*.** Inclusivity enables broader participation from stakeholders, promotes innovation and competition, and creates more opportunity for deployment. Some locations may be more viable for high-powered chargers, whereby longer dwell time locations may be more suitable to Level 2 charging. . We respectfully recommend the CEC be sensitive to the varying needs and capacities of downtown cores and users, and therefore be more inclusive toward charging technologies.

2. **EVCA does not support investing in Level 1 charging at MUDs and encourages the CEC to invest in public charging *near* MUDs as a complement to Level 2 sited at MUDs.**

We recognize that Level 1 charging can provide a low-cost opportunity when there are significant capital cost barriers to deploying stations at MUDs. However, EV drivers' charging preferences are quickly evolving, especially as the state moves beyond the "early adopters" phase of EV deployment. Many drivers already expect a fast, convenient, and accessible charging experience. As drivers increasingly rely on EVs, Level 1 charging will become quickly outdated, as EV drivers will perceive a slower charging experience as too inconvenient.

Furthermore, Level 1 charging provides minimal additional co-benefits to drivers and the grid, considering that they are generally not networked, they typically don't directly allow for power sharing, nor would they generally have the capability to directly provide grid services. The CEC is likely to miss higher priority opportunities for advancing technological developments and offering important benefits to drivers if it redirects some of its limited funds to Level 1 charging.

In addition to Level 2 charging at MUDs, the CEC should consider complementary programs to encourage public charging near MUDs as detailed in bullet 1 above. Not all residents of MUDs have access to on-site parking, and further, and not all MUD parking sites are suitable for on-site charging. As such, the importance of public charging in high density areas with MUDs provides an important complement to any MUD program.

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1 Energy Innovation. "Increasing Electric Vehicle Charging Access at Multi-Unit Dwellings: Workshop Summary Report. September 2020. Page 2.

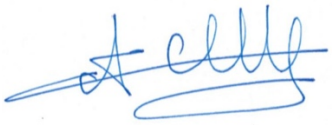
Last, any MUD programs should complement - not duplicate - MUD programs being administered by the investor owned utilities. Notably, Southern California Edison (SCE) is in the process of implementing Charge Ready 2, which will focus largely on Level 2 charging at multi-unit dwellings.

3. **EVCA recommends the CEC accommodate innovative business models in the proposed advanced technologies and charging projects.**

EVCA urges the CEC to also accommodate innovative business models and technologies in considering new charging projects. There are a number of new transportation solutions that have emerged in recent years, such as transportation network companies (TNCs), EV fleets, and vehicle sharing, that when electrified could be valuable for California's ambitious climate targets. TNCs in particular are comprising an increasingly larger share of vehicle emissions as consumers increasingly rely on them. Incentivizing infrastructure solutions to support their electrification still helps solve broader market needs, especially because these charging technologies will support broader economies of scale. However, these models remain largely ineligible for CEC program funding, due to constraints on charger ownership and public access as a function of fleet operations.

Adjusting eligibility to include high-mileage use cases like TNCs and charter-party carriers (TCPs) could complement existing successful EV programs, rapidly decarbonize transportation, and ensure that Californians without access to an EV can still benefit from sustainable, zero-emission miles. While certain proposals in this workshop such as TNC DCFCs at airports and e-mobility hubs may have limited impact in the near-term, they hold significant promise for future emissions reduction. The CEC's efforts to accommodate these innovative models in this workshop is a strong initial step forward. We encourage the CEC to expand eligibility in all future programs under consideration and may even provide the CEC with valuable learnings on cost effective infrastructure solutions that could inform future program design.

Thank you for your consideration,



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