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January 8, 2020

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Docket Number 20-TRAN-04

Commissioner Monahan,

EVgo commends the California Energy Commission (Energy Commission) for its leadership in helping the state meet its climate and zero emission vehicle (ZEV) goals and appreciates the Energy Commission's partnership as EVgo continues to develop a robust public fast charging network across California. Currently, of EVgo's more than 800 locations across the country, 300 are located within California, connecting more than 80% of the state's population to an EVgo fast charger within a 15-minute drive.

EVgo thanks the Energy Commission for hosting a workshop to discuss potential light duty solicitations to help California meet its ambitious goals. With Governor Newsom's new executive order calling for 100% ZEV for new vehicle sales starting in 2035, it is more important than ever for California to move expeditiously to support the private sector to deploy chargers at scale. Below, EVgo has included its responses to the concepts discussed in the workshop and looks forward to continuing to support California's transportation electrification goals and actions.

Sincerely,

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I. Light duty infrastructure solicitations should focus on covering gaps in coverage in high density areas as identified by the SB 1000 report.

EVgo supports Proposal 2c, whereby the Energy Commission seeks to explore alternatives to home charging through high-powered charging plazas and other locations in the downtown core. Given the findings of the SB 1000 report,[1] which found a shortage of public charging in high density areas, and a larger proportion of charging in lower density areas, it is necessary that the Energy Commission look to support the private sector in filling in gaps in more urban locations, many of which experience a higher air pollution burden and also have residents of multi-unit dwellings without access to home charging.

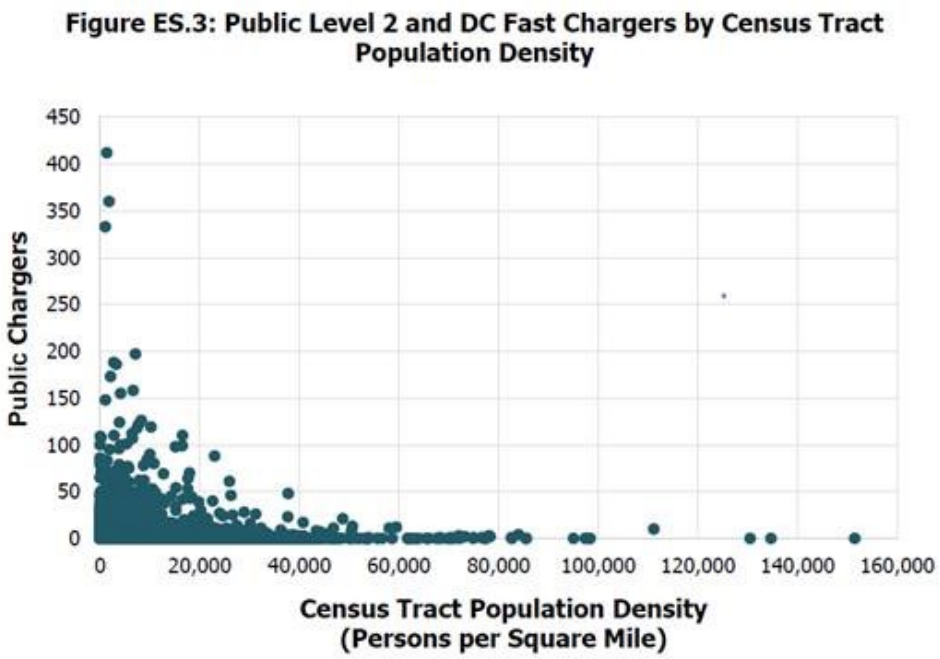

Figure 1 This graphic from the SB 1000 report shows the lack of charging stations in high density areas.

II. The Energy Commission should look to the Colorado Plazas Program as an exemplar program to target both charging in the urban cores as well as airport locations.

As the Energy Commission seeks to solicit more charging opportunities for those without access to home charging, EVgo recommends that the recent Colorado Plazas program[2] be examined as

[1] Hoang, T. (2020). *California Electric Vehicle Infrastructure Deployment Assessment Senate Bill 1000 Report*. California Energy Commission

[2] https://energyoffice.colorado.gov/zero-emission-vehicles/electric-vehicle-direct-current-fast-charging-plazas-program

a best practice in program design. This program, launched in fall 2020, sought to increase access to high-speed charging in and around metro areas and for high-mileage fleets like transportation network companies (TNCs).

Given the similar goals presented in the workshop around providing access to those without charging at home as well as TNC drivers at airports, the Energy Commission should look to this program as a best practice with one minor change. While the Plazas program sought solicitations for both urban core DCFC and airport charging simultaneously, the Energy Commission may seek to separate this solicitation into two parts, as the DCFC plazas program will be a program that could be implemented quickly, and the airports solicitation may require much coordination with the airports on the geofencing, issues of power availability, and other factors before a solicitation is issued. As such, EVgo recommends using the Plazas program as a guide, but separating it into two solicitations, with the airport solicitation more realistically having to follow the Plazas program.

EVgo is supportive of the Energy Commission's intent to drive more charging infrastructure deployments at airports, which, based on EVgo's history partnering with rideshare drivers in approximately ten markets across the country, are one of the most important locations for DCFC.

III. Solicitations focused on Level 1 and Level 2 in multi-unit dwellings should be disregarded given significant IOU investment in this space and replaced with the Plazas program discussed above.

While addressing the MUD segment is critically important to meeting California's ZEV goals, EVgo does not believe Energy Commission funding is needed to support additional Level 1 and Level 2 charging in multi-unit dwellings for a number of reasons. Additionally, as referenced in a recent report from the ULCA Luskin Center for Innovation, DCFC is critical for those without access to home charging, and EV infrastructure planners should include MUD-focused DCFC because MUD residents more frequently charge near their homes.[3]

First, as noted above, the MUD this sector is already receiving significant investment from the investor-owned utilities.[4] For example, Charge Ready 2, approved in 2020 by the California Public Utilities Commission (CPUC) will direct $436 million to fund approximately 37,800 electric vehicle charging ports in the utility's service territory, a large portion of which are to be directed to MUD charging.[5] Through the DRIVE OIR, the CPUC also presented the idea that the IOUs should focus on MUDs as a "no regrets investment".[6] As such, EVgo does not recommend that

[3]DeShazo, J.R. & Di Filippo J. (2020). *Evaluating Multi-Unit Resident Charging Behavior at Direct Current Fast Chargers*. ULCA Luskin Center for Innovation.

[4] CPUC Decisions (D) D.16-01-023, D.16-01-045, D.16-12-065 authorized SCE, SDG&E, and PG&E to each deploy infrastructure programs that install or support the installation of Level 2 electric vehicle supply equipment at workplaces and multi-unit dwellings.

[5] California Public Utilities Commission, Decision 20-08-045, p. 22, https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M346/K230/346230115.PDF.

[6]The Draft Transportation Electrification Framework at the CPUC, filed in February 3, 2020 (R.18-12-006) discusses the importance of IOU investments in MUD charging and notes on p.51 that "Given…barriers, addressing the

the Energy Commission programs duplicate efforts already being made at the CPUC.

Second, the NRG settlement provided a valuable lesson that even with ample financial resources, Level 2 installations cannot be the only way to serve the MUD segment, and DCFC is needed as a complement in the cases where on-site MUD charging is not a possibility. Through the NRG Settlement[7], through which EVgo installed 2948 make readies at multi-unit dwellings, EVgo noted challenges involved in installing make ready infrastructure at MUDs are extensive. They include not only the capital expenditure to deploy one charger per vehicle, but also owners looking for financial returns on investments, potential impact on common use parking areas, timing of vehicle purchase, smaller buildings, deeded parking, networking fees, and utility upgrades or new meters.

The program worked well for newer buildings with excess electrical power and portfolio hosts with central decision-making and an ability to spend capital on infrastructure. The program did not work well for older buildings with no excess power or outdated electrical infrastructure, subterranean parking garages, locations with longer electrical runs (especially trenching), small company owners and smaller apartment complexes, sites where funding did not cover 100% of infrastructure, sites requiring utility upgrades, and condos.

The CPUC recognized this as well, and a February 2017 amendment to the Settlement[8] allowed EVgo to reallocate $12.5 million in funding from Level 2 make readies to develop high power charging plazas in dense urban areas in order to "more effectively bring the benefits of electric vehicles to the multi-family segment." Instead of providing one charger for one driver or a few drivers in a building, a DCFC station located close to MUDs could serve thousands of residents. Relative to absolute customer & session count, the Luskin Center study found on average, these plazas served 29% more MUD customers and had 33% more MUD resident sessions than non-plazas stations.

These challenges do not mean programs to support Level 2 deployment at MUDs are not important, but that they are not a silver bullet. Utility-supported Level 2 programs should continue to try and improve access while recognizing that for California residents who rely on street parking or where Level 2 is impractical, DCFC will continue to be critical to enable EV adoption. EVgo therefore recommends that the Energy Commission's efforts are better directed to a Colorado-style plazas program to complement other programs in the state that already focus on installations in MUDs.

Conclusion

EVgo appreciates the opportunity for public comment on the concepts shared by staff and for the willingness to listen to how California can learn from examples in other states to design effective programs to reinforce California's nation-leading goals for zero emission vehicles. EVgo looks forward to working in collaboration with the Energy Commission to usher in a new era of ZEV adoption in California

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customer segments that lack access to home charging fits within the appropriate scope of program priorities that could be addressed prior to IOU [Transportation Electrification Plan] adoption."

[7] https://www.cpuc.ca.gov/General.aspx?id=5936

[8] NRG-CPUC Settlement, Second Amendment to Settlement Agreement. February 22, 2017. Available at: http://www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=6442452875

and offers itself as a resource if any questions arise.