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CalETC
California Electric Transportation Coalition

January 8, 2021

California Energy Commission
Re: Docket No. 20-TRAN-04
1516 Ninth Street
Sacramento, California 95814-5512

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Re: Comments on the CEC Staff Workshop on Funding Allocations for Future Electric Vehicle Infrastructure Projects

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide feedback on the December 17, 2020 CEC workshop on the proposed funding allocations for future electric vehicle (EV) infrastructure projects. We greatly appreciate the time and effort it took to organize this workshop and the thoughtfulness of the proposed projects.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, improve air quality, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, autonomous electric vehicle fleet operators. and other industry leaders supporting transportation electrification.

We support Staff's focus on developing EV infrastructure projects that will benefit equity communities in both urban and rural locations. To reach the state's ambitious goals, the challenges of installing infrastructure in these communities must be addressed, so we are very pleased that the CEC is looking to tackle these challenges by providing funding for innovative programs. Also, while not a focus of this letter, CalETC encourages the CEC to focus on near-term improvements to current programs, especially the CALeVIP 2021 program, where several of our members are seeing significant processing delays due to a high number of speculative projects and extremely high attrition rates. CalETC refers staff to its October 1, 2020 letter on some of the suggested program improvements, including more upfront requirements to ensure "shovel ready" projects can proceed.

Resilient Rural Charging

We recommend that the proposed Resilient Rural Charging project solicit input from rural communities and build a pilot program that addresses the unique needs of specific locations. California is a large state with diverse rural communities that will have different demands depending on climate, local environment, predominant industries, and proximity to grid infrastructure. These

site-specific factors will influence what types of infrastructure solutions will best suit the community's needs. Additionally, the individual characteristics of EV drivers will be important factors in determining infrastructure capacity and charging site locations, including vehicle dwell times and locations during those times. Due to the wide variety of needs within rural communities, the use-cases and location specific characteristics will need to be addressed to build successful pilot projects for rural communities.

TNC Friendly Airport Fast Charging

The SB 1000 report found that areas with high population density actually have less charging infrastructure deployment than less dense areas. As such, funding should be allocated for public charging in urban areas with a high density of multi-unit dwellings (MUDs) as a complement to the proposed L1 and L2 MUD programs discussed below. The Colorado DCFC Plazas Grant Program,[1] which combined high density, high usage charging in both metro areas and to serve rideshare drivers at the Denver Airport, should be used as a best practice that the CEC may emulate in crafting this solicitation. CalETC also recommends close coordination with the airports to ensure power is available in the geofenced areas. Additionally, we recommend the CEC consider setting the power level for the EVSEs at a floor of 150kW and allowing power levels to increase from there, rather than setting the level at 350kW because ultra-fast charging cannot be taken advantage of by all vehicles.

CalETC would also like to clarify a comment made by CEC staff during the workshop regarding requiring electric vehicle supply equipment (EVSE) have plug-and-charge capabilities. If the CEC finds that TNC drivers are idle long enough for charging to be effective, it seems inconsequential whether the EVSE has plug-and-charge because the vehicle will be idle long enough to process a credit card payment. CalETC's concern centers around the program requiring features above and beyond CARB's regulations developed under SB 454 and adding to the cost of charging. This is especially important because TNC drivers tend to come from disadvantaged, low-income, or communities of color. We recognize that plug-and-charge offers a superior charging experience and are not opposed to EVSEs using it and being eligible for this and other CEC programs. However, CalETC recommends not making plug-and-charge a requirement of the program unless you find that it will not add to the cost of charging.

Multi-Unit Dwellings

CalETC supports the CEC allocating funding for L1 and L2 charging at multi-unit dwellings (MUDs) to ensure low-cost options are available for EV infrastructure retrofits. Installing EV infrastructure at MUDs has proven to be very challenging. Including funding for L1 provides a low-cost option to retrofit parking garages with charging infrastructure. Note that retrofitting L1 for MUDs is likely only appropriate for parking garages and not parking lots, because the cost of trenching will outweigh any cost savings for installing L1. Therefore, more funding should be allocated for L2, because L2 is appropriate for both parking lots and parking garages and will be more useful long-term as EV battery

[1]See ALT Fuels Colorado Electric Vehicle Direct Current Fast-Charging (DCFC) Plazas Grant Program Report available at https://energyoffice.colorado.gov/sites/energyoffice/files/2020-07/ev_dcfc_plazas_grant_program_rfa_final.pdf.

sizes continue to increase. Moreover, low-cost energy management systems can be installed with L2 to efficiently distribute power between vehicles.

On-site parking is not always available at MUDs, so many tenants will need to rely on public charging. Given the shortage of public charging in population dense areas described in the SB 1000 report, CalETC recommends including public charging hubs and curb side charging that can serve MUDs as part of the strategy to get charging to this hard-to-reach segment. Lastly, the CEC should seek to coordinate with and complement the investments in MUD charging being made by IOUs through programs at the CPUC.

Future Projects: Advanced Technologies

CalETC supports Proposals 1c for V2X Charging, 2a for Vehicle-Grid Integration (VGI), and 2c for Alternative "Home Charging." We see these proposals as having the potential to provide significant benefits to EV drivers and the grid. Developing Proposal 1c for V2X Charging is important for EV drivers that live in areas effected by wildfires and other natural disasters. We recommend Proposal 1c address the standards that need to be developed, and work with automakers and the national laboratories to establish which standard will best suit V2X use cases. We also recommend that CEC coordinate closely with the Public Utilities Commission (PUC) on their V2X programs to ensure funding is allocated appropriately. We also support Proposal 2c for alternative "home charging," as noted above, this will be an important part of creating access to charging for people who live in MUDs and do not have a designated parking space to charge. Finally, we recommend Proposal 2a be coordinated with the CEC's VGI Roadmap and the PUC's VGI Workgroup, which has developed a set of policy priorities for VGI projects that can inform what type of projects should receive funding.[2]

e-Mobility Hubs

CalETC suggests expansive thinking about e-mobility depots/hubs for vehicle sharing, ridesharing, and transit centers. The CEC's e-mobility hub proposal could also incentivize the electrification of high-mileage use cases, such as TNCs, charter-party carriers (TCPs), vehicle and ride sharing, transit, multimodal connections, and other electric vehicle fleets. By making sure innovative and cutting-edge business and operational models are eligible, these e-mobility hubs could increase collaboration and accelerate transportation decarbonization by encouraging cost-sharing on otherwise highly capital-intensive owned-and-operated charging infrastructure projects.

Expanded Focus on Access

CalETC appreciates the CEC's focus on making EVs an option for all Californians. As such, we suggest that funds in as many categories as possible be open to applicants that have business models that would bring EVs to Californians regardless of their ability to own a vehicle (i.e., ridesharing business models like those of existing TNCs and AV TCP ridesharing fleets). As the EV space has many emerging business models, we respectfully request that program eligibility rules be written broadly to

[2] See Gridworks website for more information at https://gridworks.org/initiatives/vehicle-grid-integrationwg/.

encourage innovation and provide emerging business models the opportunity to apply and be evaluated for funding.

Thank you for considerations of our comments and do not hesitate to contact me if you have any questions.

Best regards,

Kristian Corby, Deputy Executive Director