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

Subject: City of Sacramento Comments on Future Electric Vehicle Infrastructure Project Funding

Dear Energy Commission staff,

We appreciate the opportunity to participate in the two transportation funding workshops convened on December 17, 2020, regarding future transportation investments. The Energy Commission (CEC) plays a critical role deploying funding and enabling all partners, public and private, to support our ambitious state goals for the rapid transition of transportation to zero-emission technologies and modes. We have prioritized three comments for your consideration below, which we strongly urge staff to consider while developing future programs. These comments are underpinned by the City's commitment to advance equitable, inclusive electric mobility.

1. Public agencies are unique partners in meeting the state's EV infrastructure goals and should be accounted for in program design

The City of Sacramento is a proud recipient of a Phase 1 EV Blueprint Implementation grant from the Commission. Today we were also identified as a proposed award recipient for Phase 2 funding. We greatly appreciate CEC investment and acknowledge its importance as we work to build an inclusive e-mobility system.

Public agencies like the City of Sacramento are uniquely aligned with the CEC's goals for community charging access. All types of partners play an important role, including private charging networks, mobility companies, and more. Yet public agencies hold two unique attributes: not only are we driven by community interest and equity goals, but we also hold land that is available for EV infrastructure, from parking lots in libraries, community centers, and more. Hence, public agencies like the City of Sacramento are especially ready for state infrastructure investment. Not only do we have an aligned motivation, but we also have the property available on a more turn-key basis. These factors are even more relevant when

considering approaches to bring EV technologies to disadvantaged and low-income communities, which may not provide the density or market draw to attract for-profit providers of their own accord.

Therefore, we strongly urge the CEC to design future programs to better support agencies for infrastructure deployment. We have found that both competitive grants and rebates administered by the CEC can be cumbersome, time-consuming, and require an extensive amount of staff time and expertise. If all agencies are to be engaged to meet ambitious EV infrastructure, more turn-key and streamlined processes are warranted.

We strongly urge consideration of simplified direct block-grant allocation programs for agencies, with streamlined criteria for eligibility and more robust technical assistance. These measures will ensure participation by a range of agency partners. Rather, for an agency to currently access funding, it must often participate in long, multi-phase processes to track and identify highly competitive funding opportunities that typically are only available to a small handful of awardees, only by following and participating in very specific proceedings of the CEC. We recognize that Sacramento has greatly benefitted from these programs, and such programs play a role in encouraging innovation and best practices; however, such competitive approaches should be complemented with simpler types of direct grant allocations that can support expedited, proven approaches to just get infrastructure in the ground.

Similarly, we advise that future rounds of block-grant rebates better account for the unique needs and capacities of public agencies. From our experience, the existing CALeVIP program could be enhanced to better support participation by municipalities and/or other public agencies. Specifically, agencies hold potential to deploy at numerous locations. We strongly recommend a streamlined procedure, and use of an administrator with experience in local project implementation. We also offer that the first-come, first-serve model, may disadvantage smaller organizations or agencies that lack the knowledge or capacity to apply upfront. This leads to funds being committed early on, and may prevent a broader array of application types that require greater partnership or technical assistance. Typically, these partnerships and technical support are necessary to bring infrastructure to disadvantaged communities, and it merits more support and accommodation through the rebate process. Please also refer to our separate comment letter submitted to Docket No. 17-EVI-01 for additional details regarding our experience with the current round of CALeVIP funding.

2. Increased transparency with CEC investments & planning

We recommend providing more transparent mapping data and analysis, including public maps that identify investment locations for CEC funding and future priority areas. Such a map would greatly assist us with our community-wide EV deployments, helping us plan for where our agency can play a role filling infrastructure gaps and ensuring that infrastructure is deployed equitably. For example, we have learned anecdotally that many of the CALeVIP projects in our City have occurred within the urban core, where we already have a density of charging infrastructure.

Importantly, it will also be critical for agencies to have access to more detailed, regional and sub-regional CEC analyses to understand both historic investments, and priorities for future phases of work. Such information helps us better plan our projects, and achieve an equitable distribution of infrastructure.

3. Increase public engagement outside of regulatory proceedings

We have greatly benefitted from our direct engagement with CEC staff, apart from formal CEC proceedings. In order for the CEC to continue to learn from the experience of local partners and agencies, we strongly advise the CEC to consider more direct outreach to regional and local EV networks, agencies, stakeholders, and associations. This engagement can be an opportunity to share relevant CEC proceedings to stakeholders, while also encouraging a more direct two-way sharing of information. We believe such direct engagement would also be instructive to the CEC as it continues to roll out major infrastructure investments. For example, the City of Sacramento is an Executive Committee member of the Sacramento-area Plug-in EV Collaborative. This network consists of a range of agencies, nonprofits, community-based organizations, technology organizations, and stakeholders and partners. The network serves as a great forum for the sharing of information and identification of creative solutions. Similar networks are to be found all across the state.

Further, we specifically wish to advocate for this simple engagement approach as the CEC is seeking to accelerate investment in disadvantaged communities and amongst a wider array of stakeholders. Through our experience in the Sacramento region, we have learned that such shifts require an investment of time to build relationships, trust, and identify interdisciplinary models and efforts. Based on our experience, we believe that this type of thoughtful and deliberate approach is necessary to truly address the needs of the most underserved in our communities. While regulatory proceedings have their place, they do not serve to invite the key community partners that are best equipped to help us undo decades of disinvestment in frontline communities.

To conclude, we acknowledge that transportation electrification provides one of the most promising GHG reduction strategies, but we emphasize that it will only serve our long-term goals to the extent that we can bring along all communities with an equity-based approach. Towards these ends, we strongly urge consideration of our suggestions. Thank you for this opportunity to provide our recommendations.

Best regards,



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