

DOCKETED

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AEE Comments on CALeVIP 2021 Implementation Workshop

Additional submitted attachment is included below.

March 19, 2021

California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Re: Docket 17-EVI-01 – CALeVIP 2021 Implementation Workshop

Dear Commissioners:

Advanced Energy Economy (AEE) respectfully submits these comments in response to the California Energy Commission's (CEC) March 11 CALeVIP 2021 Implementation Workshop inviting stakeholder comment on proposed design modifications. AEE strongly supports the CEC's transportation electrification (TE) objectives and recognizes the importance of CALeVIP in achieving the infrastructure deployment goal of 1.5 million chargers by 2030 considered in the CEC's recent Assembly Bill (AB) 2127 Electric Vehicle Charging Infrastructure Assessment. We thank the CEC for the opportunity to comment and look forward to the agency's continued leadership in supporting TE.

AEE first seeks clarity surrounding several elements related to the implementation of the Electric Vehicle Infrastructure Training Program (EVITP) requirements stipulated by AB 841 (Ting). During the CEC's workshop, it shared that EV charging service providers and site hosts could begin to develop sites at their own risk before being formally reserved for CALeVIP funding for the upcoming 2021 CALeVIP incentive projects – including the Inland Counties project set to launch in May. The CEC also specified that it would begin requiring EVITP certification for applications moved into reserved status on or after September 1, 2021. However, given the possibility that potential charger deployments in the Inland Counties project will not be notified until after September 1 of their award status, it is not clear whether the CEC's EVITP certification requirements apply to these potential Inland Counties deployments. In order to keep EV charger deployments on a level playing field within the Inland Counties project and establish greater certainty for developers, AEE respectfully requests that all Inland Counties built before and whose application may enter a reserved state on or after September 1 not be subject to EVITP certification requirements for any work completed prior to the certification start date. In

other words, conditioning the applicability EVITP requirements on when the CEC moves the project into reserve status is fundamentally dependent on the CEC and Center for Sustainable Energy's (CSE) internal application review processes – processes that are out of developers' control. Establishing clear, uniform treatment of project applications submitted before September 1 creates a more level playing field from which developers can plan and make investments to support EV charging. We look forward to the consistent implementation of EVITP requirements in future CALeVIP projects.

AEE also appreciates the CEC's proposals to update CALeVIP program requirements in a manner that reflects the evolution of the EV charging industry and the state's EV charging needs. Lowering per port and per charger rebates across several categories may help partially address some of the oversubscription issues faced in CALeVIP, potentially support greater amounts of EV charging infrastructure deployment with limited funding, and in the case of fast charging, encourage installation of higher capacity chargers that meet drivers' needs. AEE also supports the increased disadvantaged community minimum target in accordance with AB 841 and looks forward to working with the CEC on addressing charging gaps that benefit these communities. We also look forward to future clarification from the CEC on how its findings from the Electric Vehicle Charging Infrastructure Assessment can be implemented in CALeVIP and other CEC initiatives to support more convenient, flexible, and affordable charging that benefits drivers, utility customers, and the grid.

Respectfully submitted,

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