

DOCKETED	
Docket Number:	21-ALT-01
Project Title:	2021-2022 Investment Plan Update for the Clean Transportation Program
TN #:	237810
Document Title:	EVgo Comments on CEC 2021-2023 Clean Transportation Program Investment Plan
Description:	N/A
Filer:	System
Organization:	EVgo
Submitter Role:	Public
Submission Date:	5/14/2021 1:58:21 PM
Docketed Date:	5/14/2021

*Comment Received From: EVgo
Submitted On: 5/14/2021
Docket Number: 21-ALT-01*

EVgo Comments on CEC 2021-2023 Clean Transportation Program Investment Plan

Additional submitted attachment is included below.



May 14, 2021

Ms. Patricia Monahan
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

RE: EVgo Comments on Docket Number 21-ALT-01 2021-2023 Clean Transportation Program Investment Plan Update

Dear Commissioner Monahan,

EVgo commends the California Energy Commission (CEC) for its leadership in helping the state meet its climate and zero emission vehicle (ZEV) goals and appreciates the opportunity to comment on the 2021-2022 Clean Transportation Program update.

Headquartered in Los Angeles, EVgo is the nation's largest public fast charging network for electric vehicles, and the first to be powered by 100% renewable energy. With more than 800 locations in more than 65 metropolitan areas across 34 states, including over 300 fast charging locations in California, EVgo serves more than 250,000 customers. In 2020, EVgo announced a new partnership with General Motors, whereby EVgo will triple its DC fast charging (DCFC) network across 40 metropolitan areas over the coming years by building more than 2700 fast chargers across the country. EVgo also works with other automakers such as Nissan to expand charging in key markets.

EVgo thanks the Energy Commission for hosting its advisory committee workshops to discuss the changes and plans for the Clean Transportation Plan's update and applauds the multi-year approach in order to give businesses and stakeholders program certainty, as well as the emphasis on equity. With Governor Newsom's executive order calling for 100% ZEV for new vehicle sales starting in 2035, and the CEC's projected need 1.5 million chargers by 2035 as identified in the AB 2127 report, it is imperative that the state continue investing in the charging infrastructure programs to match the scale needed to meet these ambitious goals. The Clean Transportation Program (CTP) remains one of the state's most effective tools to promote the decarbonization of California's transportation sector, leverage private sector dollars, and fund shovel-ready projects.

Below, EVgo respectfully submits recommendations for the advisory committee and Energy Commission's consideration. EVgo looks forward to continuing being a partner to the CEC in its pursuit of a fully electrified transportation sector and welcomes itself as a resource if any questions arise.

Best,

Sara Rafalson
Vice President, Market Development
sara.rafalson@evgo.com

1. **California Energy Commission programs have been critical for driving forward investments in public charging infrastructure, and sustained light duty investments are needed to meet state infrastructure goals.**

Clean Transportation Program investments have helped make great strides towards the proliferation of charging infrastructure across the state, and EVgo is appreciative of past weight given towards light duty funding. However, EVgo remains concerned at the drop off in light duty funding in 2023. As the CEC reports in its own plan, even with all state funding and planned investments taken into account, there is a projected shortage of more than 57,000 light duty chargers ahead of California’s 2025 goal.¹

Table ES-2: Investment Plan Allocations for FY 2021-2022 and Subsequent Fiscal Years (in Millions)

Category	Funded Activity	2021-2022	2022-2023	2023-2024**	Total
Zero-Emission Vehicles and Infrastructure	Light-Duty Electric Vehicle Charging Infrastructure and eMobility	\$30.2	\$10.0	-	\$40.2
Zero-Emission Vehicles and Infrastructure	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure	\$30.0	\$52.2	\$27.6	\$109.8
Zero-Emission Vehicles and Infrastructure	Public Hydrogen Fueling Infrastructure	\$20.0	\$20.0	\$10.0*	\$50.0
Alternative Fuel Production and Supply	Zero- and Near Zero-Carbon Fuel Production and Supply	\$10.0	\$10.0	\$5.0	\$25.0
Related Needs and Opportunities	Manufacturing	\$3.0	\$1.5	\$2.5	\$7.0
Related Needs and Opportunities	Workforce Training and Development	\$2.0	\$1.5	\$2.5	\$6.0
	Total	\$95.2	\$95.2	\$47.6	\$238

Figure 1 This graphic from the CEC Clean Transportation Plan Investment Updated staff report showing the cut off of light duty EV charging infrastructure funding.

For California to move to 100% ZEV for all new vehicles starting in 2035, now is not the time to scale back on investments in light duty charging. EVgo respectfully requests that the CEC extend and properly fund light duty infrastructure investments for the duration of the Clean Transportation Program, while also taking into account the need for equitable distribution of charging infrastructure as noted in the SB 1000 report. Additionally, the Energy Commission should consider vehicle models coming to market in the coming years that will necessitate more higher power charging infrastructure and respectively, higher costs. While EVgo and other networks continue to make progress towards the state’s infrastructure goals, the EV industry still remains in its early stages, and additional private-public partnerships will be necessary to drive and accelerate investments, as well as bolster the consumer confidence necessary to shepherd the massive behavioral change required to reach an all ZEV future.

Fast charging infrastructure in particular is critical to reaching the state’s increasing population of EV drivers and is especially crucial to enable electrification for drivers without reliable access to charging at home or in the workplace, residents of multi-unit dwellings who rely on public charging for the majority of their charging needs, drivers utilizing key transit corridors, as well as light duty vehicle (LDV) fleets, including car sharing and ride sharing applications. While rapidly growing, this market, especially for

¹ California Energy Commission, 2021-2023 Investment Plan Update (Staff Draft Report), page 6.

DCFC, is still nascent. By CEC’s own estimates, 67,000 DCFC will be necessary to support light duty vehicles by 2030.²

2. **In order to maximize the value of light duty investments, CEC solicitations should prioritize enabling private sector deployments to cover gaps in high density areas as identified by the SB 1000 report.**

As stated in previous comments to the CEC in January 2021³, EVgo supports the CEC exploring alternatives or complements to home charging through high-powered charging plazas and other locations in the downtown core. Given the findings of the SB 1000 report,⁴ 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 tailor programs fill in gaps in more urban locations, many of which experience a higher air pollution burden and also have a larger proportion of residents of multi-unit dwellings without access to home charging. 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.⁵

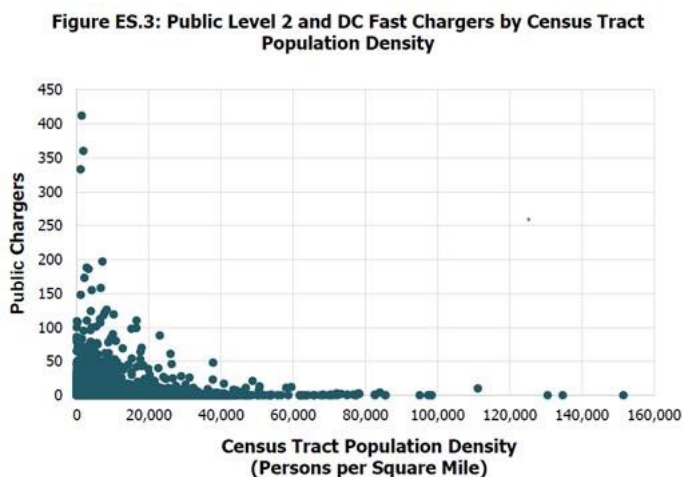


Figure 2 This graphic from the SB 1000 report shows the lack of charging stations in high density areas.

3. **The Energy Commission should continue exploration of urban mobility charging hubs as part of its investment plan.**

EVgo was pleased to see the CEC announce upcoming solicitations to increase EV charging to serve transportation network company (TNC) drivers and potentially electric taxis, shuttles, and other shared

² California Energy Commission, *Assembly Bill 2127 Electric Vehicle Charging Infrastructure Assessment Analyzing Charging Needs to Support Zero-Emission Vehicles in 2030*, January 2021

³ 20-TRAN-04, *EVgo Comments*, January 2021, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=236257&DocumentContentId=69227>

⁴ Hoang, T. (2020). *California Electric Vehicle Infrastructure Deployment Assessment Senate Bill 1000 Report*. California Energy Commission

⁵ DeShazo, J.R. & Di Filippo J. (2020). *Evaluating Multi-Unit Resident Charging Behavior at Direct Current Fast Chargers*. ULCA Luskin Center for Innovation.

vehicles, to promote and accelerate adoption of EVs by TNC drivers and other high-mileage vehicle drivers. EVgo strongly supports this solicitation concept and also recommends that future solicitations cater to other light duty fleets, including last mile delivery.

With the Air Resources Board taking up the final draft regulation order for the California Clean Miles Standard in May and its forthcoming implementation, the Energy Commission should seek to augment charging infrastructure for this rapidly growing segment. Since light-duty fleet drivers drive on average more than three times a personal use driver, there is ample opportunity produce outsized emissions reductions benefits by focusing charging infrastructure in a way that is focused and convenient light duty fleets, rideshare, and delivery applications.⁶

DC fast charging provides for fast and convenient charging for light duty fleets, rideshare, and delivery applications. EVgo recommends that the Energy Commission explore best practices from other states in this regard, including the Colorado Plazas Program, an exemplar program that simultaneously targets both charging in the urban cores as well as airport locations. 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 TNCs, as well as apartment dwellers.

As CEC contemplates program design for its own light duty fleet and/or TNC solicitation, EVgo encourages flexibility, specifically in regards to public accessibility requirements, as real estate constraints in urban locations mean that not all sites can offer 24/7 access. Similarly, while dedicated charging hubs for fleet drivers should be eligible, hybrid sites that offer a mixture of public and private access should be welcome, in addition to sites where all of the chargers are publicly accessible and are sited in locations best suited for these types of drivers while also providing access to the public.

Conclusion

EVgo thanks the Energy Commission for the opportunity to provide recommendations to the Investment Plan update provided by staff. California remains at the forefront of transportation electrification, and through collaborative partnerships and effective program design, there is strong opportunity to meet California's ambitious climate and infrastructure goals. Please continue to consider EVgo as a resource if any questions or further information can be provided.

⁶ UC Davis, *Policy Institute for Energy Environment and the Economy, Policy Pathways to TNC Electrification in California*, May 2020.