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Coalition comments on CTP Investment Plan from Flo, Cruise, Freewire, EVgo, and Uber

Additional submitted attachment is included below.



May 14, 2021

Ms. Patricia Monahan
Commissioner, Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Docket: 21-ALT-01

Re: Coalition comments on the importance of investing in “Urban Mobility Hubs” via the 2021-2023 Clean Transportation Program Investment Plan

Dear Commissioner Monahan,

On behalf of the undersigned organizations, thank you for the opportunity to comment on the draft 2021-2023 Clean Transportation Program Investment Plan.

The Commission’s investments in zero-emission vehicle (ZEV) infrastructure have been critical to commercializing various EV segments for the last decade. Given the Governor’s Executive Order to require 100 percent of all new vehicle sales to be zero-emission by 2035, the Commission has a continued integral role deploying infrastructure strategically to enable its success.

As part of the state’s tapestry of vehicle regulations to transition the industry to zero-emission, the Air Resources Board is considering the final draft regulation order for the California Clean Miles Standard at its May board hearing. Electrifying such a large segment of vehicles will not only reduce greenhouse gas emissions and air pollution, but further help ZEV, charging, and refueling infrastructure markets further scale up and thereby continue to bring down costs and increase access for all Californians.

While the state has made great strides to deploy significant amounts of public charging stations over the last decade, infrastructure gaps remain in key locations for various segments of the ZEV market that may not be captured by current incentive programs. “Urban mobility hubs”, which include downtown cores in urban centers, nearby fleet charging depots, airports, and areas with large concentrations of multi-unit dwellings,

need robust infrastructure to serve ride-hailing. This is reinforced by the Energy Commission's AB 2127 EV infrastructure assessment, which concluded that there are high concentrations of ride-hailing vehicles at these hubs, and they will need access to a higher amount of available charging, especially DC fast chargers¹. This is further substantiated by the Energy Commission's SB 1000 report, which showed that in higher density areas, there is a shortage of charging infrastructure, especially fast charging infrastructure, which is critical to rapid charging experiences for TNCs.² Analysis from UC Davis' Institute of Transportation Studies also concluded that overnight charging solutions could be an important component of infrastructure deployment strategies to reduce the cost of charging³.

This coalition was encouraged by the Energy Commission's indication that it will be pursuing solicitations for light duty fleets. We support this and respectfully encourage the Commission develop streamlined, block grant model incentive programs to rapidly deploy infrastructure and support for electrifying ride-hailing vehicles in these areas. The potential benefits of such funding streams are immense, including:

- Reducing air pollution and greenhouse gas emissions, creating as much as 3 times greater emission savings compared to when average car owners switch, according to UC Davis research.⁴ That same research found that a ride-hailing EV has sixty times the energy demand needs of a personally-owned EV;
- Serving more users, data released by one TNC demonstrates that on average one active battery EV driver on Uber's platform in California serves 120 active riders per month⁵;
- Serving an important gap in the ZEV infrastructure market by enabling targeted deployment in critical locations;
- Providing an important equity benefit to Californians who lack access to deploy infrastructure solutions at their home and/or may not be able to afford an EV; and
- Supporting the implementation of a critical vehicle regulation from the Air Resources Board in support of the state's long-term ZEV deployment goals.

¹ California Energy Commission. *AB 2127 Electric Vehicle Charging Infrastructure Assessment*. January 2021. Page 41.

² California Energy Commission. *SB 1000 Electric Vehicle Charging Infrastructure Deployment Assessment*. December 2020. Page 27.

³ Jenn, A. *Charging Forward: Deploying Electric Vehicle Infrastructure for Uber and Lyft in California*. March 2021. Page 11.

⁴ Jenn, A. *Emissions benefits of electric vehicles in Uber and Lyft ride-hailing services*. *Nat Energy* 5, 520–525 (2020). <https://doi.org/10.1038/s41560-020-0632-7>.

⁵ Uber. *Climate Assessment and Performance Report*. September 2020. Page 42. <https://www.uber.com/us/en/about/reports/sustainability-report/>.

Thank you for your consideration,

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