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EVCA Comments on CTP 2021-23 Investment Plan

Additional submitted attachment is included below.



Electric Vehicle Charging Association
INNOVATION FOR CLEAN MOBILITY

May 14, 2021

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

Re: EVCA Comments on the 2021-2023 Clean Transportation Program Investment Plan Update

Dear Commissioner Monahan,

On behalf of the Electric Vehicle Charging Association (EVCA), thank you for this opportunity to comment on the updated 2021-2023 Investment Plan (Plan) for the Clean Energy Commission's (Energy Commission) Clean Transportation Program (CTP). EVCA appreciates the Energy Commission and advisory committee's workshops to keep key stakeholders like EV charging providers involved in the CTP updates. EVCA applauds the Commission's leadership in advancing a fully electrified transportation sector and work to support the goal to deploy 250,000 charging stations by 2025.

EVCA is a non-profit organization whose mission is to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the expeditious and efficient adoption of EVs and deployment of EV charging infrastructure. We work to expand clean transportation by promoting the continued growth of EV charging infrastructure, technology, and services. Our efforts are especially important in California, which maintains a majority of the nation's EV market and is investing in the expansion of related infrastructure.

EVCA respectfully submits the following recommendation for the Commission's consideration as it continues to develop its investment plan. EVCA looks forward to continuing its partnership with the Commission as we pursue a fully electrified transportation sector:

Ensure funding certainty of light duty electric vehicle charging infrastructure past 2022 in the CTP to meet state infrastructure goals

The CTP's investments in light duty charging infrastructure have been instrumental in the state's progress towards providing adequate and reliable access to charging across the state. In order to continue this transformation of the transportation sector, the state

has set goals to deploy 250,000 charging stations by 2025, including 10,000 DC fast chargers, and 5 million zero-emission vehicles by 2030, and, per Governor Newsom's executive order, would require that all new vehicle sales by 2035 be zero-emission. EVCA strongly supports these ambitious objectives, but we stress that achieving them will be no small task. This will require significantly more infrastructure beyond the 2025 charging goal as previously set forth. Given the CEC's assessment that 1.5 million chargers will be needed to support this goal,¹ increased investments in infrastructure and policy alignment among agencies is critical to achieving the state's goals.

Light-duty vehicle infrastructure investments will be especially critical to giving consumers peace of mind when considering the purchase of a zero-emission vehicle. However, the CEC would send the wrong market signal at the wrong time by proposing not to allocate any funding for light-duty EV charging past 2023 through the CTP. The industry is just beginning to ramp up deployment of new, higher power vehicle models, and the Clean Miles Standard implementation is beginning in earnest. If the CEC intends to stop incentivizing light-duty EV charging stations well before the markets for vehicles or infrastructure have reached maturation, this would not only introduce significant uncertainty in the marketplace as charging providers look to forecast their investments, but it would also risk that a lack of infrastructure will remain a large barrier to adoption, just as the state should instead be looking to *encourage* EV adoption by all means possible to meet its 2030 goal for 5 million ZEVs on the road.

Conclusion

EVCA greatly appreciates the CEC's long-time leadership in supporting zero-emission vehicle and infrastructure deployment. The Commission's legacy of innovation and support for these technologies has undoubtedly been critical to this industry's growth. Therefore, EVCA respectfully requests the Commission include an allocation for light-duty EV charging infrastructure past 2023 to maintain a strong market signal and to further help support both EV adoption for personal use drivers that will help California meet its 2030 state goals.

If there are any questions or if any further information is desired, please do not hesitate to reach out.

Thank you for your consideration,

Dylan Jaff
Electric Vehicle Charging Association

¹ California Energy Commission, *Assembly Bill 2127 Electric Vehicle Charging Infrastructure Assessment Analyzing Charging Needs to Support Zero-Emission Vehicles in 2030*, January 2021