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EV charging access for all

Current and proposed future building codes are stacked against residents of multi-family housing and rural communities. (Currently only 10% of parking in brand-new multi-family housing is required to be wired for EV charging, vs. 100% of single-family housing.) So thank you CEC for focusing on these as target populations for EV infrastructure.

We are in an accelerating climate crisis, and California is nowhere near meeting its ambitious EV goals. CEC should require 1) ubiquitous EV charging wherever possible, and 2) the most charging spaces per dollar be delivered on this investment.

Proposed Funding and Eligibility:
Please change the projectâ€™s overall goals to read, â€œSuccessful outreach, installation, and use of chargers low-cost charging, particularly in: Disadvantaged and/or low-income communities and Affordable housing unitsâ€□.
Rationale:
Equity demands that low-income communities get access to low-cost charging
50% of EV charging currently happens on L1 at home, using a simple 110v outlet. This is the lowest-cost charging option and needs to be made available to low-income communities. Using â€œchargersâ€□ as an eligibility requirement automatically jacks up the price, limiting the number of low-income people who will benefit from this public spending.
Recognize that installation costs depend on use cases, and can vary widely. For 100 spaces, for instance:
$1.5M - includes bringing in a new electrical panel for full-power Level 2, plus trenching ($15,000/space x 100)
$300,000 - uses existing power for low-power Level 2 or Level 1 ($3,000/space x 100)
Project teams should be required to include local community-based groups representing local, low-income and/or POC communities. These groups understand the communities best and their involvement will help ensure appropriate outreach and EV adoption.
Note that City or county government agencies, regional transportation planning organizations, and joint power authorities should NOT count as community-based groups for these purposes.
Please include protections for tenants as a requirement for low-income/disadvantaged community site participation, to ensure the cost of housing does not increase once charging is installed.

Match Funding
Lower or zero match requirements should apply for:
Low-Income/Disadvantaged communities
Projects with the lowest-cost per space and highest number of residents served

Non-profit applicants

Project Readiness
Include time (and support) for community outreach and education.
Recognize that interest from a site owner doesnâ€™t necessarily include interest or understanding from site tenants. Plan to include EV education and outreach to residents to ensure maximum adoption.

Proposed Technical Requirements
Remove the requirement that all Level 1 chargers must be equipped with SAE standard J1772 connectors. This adds cost and is unnecessary, as all EVâ€™s come with their own L1 cordset.
Remove the requirement that all chargers installed must be network capable. This adds significantly to the cost and lowers the number of people with access to EV driving. Instead, specify what kind of data is important to collect.
Use learnings from a recent Sacramento Municipal Utility District pilot which relied on electric meters and the utilityâ€™s communications backbone, rather than â€˜networkedâ€™ chargers
CEC has been requiring data from EV grants for the past decade. Use the data CEC has gleaned from prior network-requiring grants to clarify what specific data is necessary, and why.
For example: â€œType of vehicle chargedâ€ may not be a necessary/ reasonable data point; if it is needed, mounting a small wifi-enabled video camera at a charging site might be a cheaper way to get that data.
If networking is required for data collection, consider requiring networking in a statistically meaningful sample (10-20%) rather than requiring the entire site to be networked.
Remove DC Fast Charging (DCFC) as an option for multi-family charging. CEC, CPUC, Tesla and Electrify America are already spending lots of money on extending the DCFC networks. Low-cost ubiquitous at-home charging for multi-family and low-income residents is a gaping hole in Californiaâ€™s infrastructure -- CEC money should be used to address this need, and serve as a model for future public investment.

Proposed Evaluation Criteria
Add Experimental Design & Evaluation (ED&E) - CEC should require an ED&E plan for both Multi-Family Housing and Rural Communities RFPâ€™s. Proposals should specify how they plan to design their project to collect data, and how they plan to analyze the results.
Add a 15-point criterion: â€˜lowest cost per space served (in aggregate)â€™. Take points away from Project Location and Readiness to account for this.
Cover a broad spectrum of use cases. Possible criteria could include:
Construction era of proposed building sites (e.g. pre-1960, 1960s-70s, 1980-2000, etc)
What % of power is available at the siteâ€™s existing panel
Location of parking within a building site (i.e. distance from electrical panel, inside vs. outside, etc.)

Proposed Data Collection

Data collection comes at a price, which may not serve the projectâ€™s priority objectives. Clarify and focus on this projectâ€™s objectives in order to make informed trade-offs.

Example: Bidirectional charging might be a nice-to-have, but its high cost would limit ubiquitous availability of charging.