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EVCA Comments on the CECâ€™s Draft Solicitations on Rural and Multi-Unit Dwelling Charging

Additional submitted attachment is included below.

Electric Vehicle Charging Association

INNOVATION FOR CLEAN MOBILITY

July 13, 2021

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

Docket: 20-TRAN-04

Re: EVCA Comments on the CEC's Draft Solicitations on Rural and Multi-Unit Dwelling Charging

Dear Commissioner Monahan,

On behalf of the Electric Vehicle Charging Association (EVCA), thank you for the opportunity to comment on the California Energy Commission's (CEC) upcoming solicitation for rural and multi-unit dwelling (herein referred to as multi-family dwellings [MFD])charging. EVCA is a not-for-profit trade organization of twelve leading electric vehicle (EV) charging industry member companies and one zero-emission autonomous fleet operator. EVCA's 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.

EVCA applauds the Commission's continued leadership in transportation electrification, especially with its increased focus on equity and ensuring that all communities have access to charging infrastructure. EVCA particularly applauds the work done around the SB 1000 (Lara, 2018) report, which identifies a need for additional charging infrastructure in densely populated areas.[1] With the goal of 1.5 million charge ports by 2035, the Governor's executive order for complete EV sales by 2035[2], and the Air

[1] California Energy Commission, *SB 1000 Electric Vehicle Charging Infrastructure Deployment Assessment*, https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=20-TRAN-02

[2] https://www.gov.ca.gov/2020/09/23/governor-newsom-announces-california-will-phase-out-gasoline-powered-cars-drastically-reduce-demand-for-fossil-fuel-in-californias-fight-against-climate-change/

Resources Board's recent adoption of the Clean Miles Standard[3], the need for infrastructure funding programs is important to support these goals, further help zero-emission vehicle (ZEV) and charging infrastructure markets further scale up and thereby continue to bring costs down for all Californians.

To that end, we respectfully suggest the following programmatic design elements for the Commission to consider in its upcoming solicitation:

1. **For the multi-family dwelling (MFD) solicitation, consider using a drive time of <10 mins instead of distance of a half mile for scoring metrics to accurately capture driver experience and prioritize site locations with amenities.**

In the draft solicitation, the CEC has proposed using "distance to residents served" as a metric for scoring. From the siting perspective, requiring site proposals to be within such a close mile range can be too limiting of a requirement given the constraints of available real estate and public accessibility for station siting.

For the MFD solicitation, staff stated that site applications not directly in the MFD be within ½ mile of MFDs. Public charging, especially fast charging, is critical to underpinning EV adoption, especially in MFD dense areas, where 43 percent of drivers rely on public fast charging as their primary source of charging[4]. Drivers are more likely to drive to a commercial retail area (e.g. a grocery store) for charging needs and programs should factor in flexibility to allow for these locations that have amenities for an ideal customer experience. Furthermore, drive time can vary widely in relation to distance when considering factors like density of a given area and traffic.

EVCA suggests allowing chargers to be within 3 miles of the MFD or a drive time of less than 10 minutes to more accurately and equitably serve drivers. Lastly, this further aligns the program with the CEC's forthcoming updated 2021 SB 1000 analysis that will study drive times from MFDs and rural areas to the nearest public fast chargers. Similarly, EVCA respectfully suggests that proximity to amenities be weighed heavily in the scoring rubric to improve the customer experience.

2. **Some data reporting fields should be optional, recognizing EVSPs' different business models, consumer information, and reporting capabilities.**

While EVCA supports the programs' requirements for submitting data, not all data fields requested are feasible at this time. Not all EVSPs have the capability to track

[3] https://ww2.arb.ca.gov/news/california-requires-zero-emissions-vehicle-use-ridesharing-services-another-step-toward

[4] UCLA Luskin Center, Evaluating Multi-Unit Resident Charging Behavior at Direct Current Fast Chargers, https://innovation.luskin.ucla.edu/wp-content/uploads/2021/03/Evaluating-Multi-Unit-Resident-Charging-Behavior-at-Direct-Charging-Behavior-at-Direct-Current-Fast-ChargersCurrent-Fast-Chargers.pdf

certain fields, such as “types of vehicles charged”. Additionally, reporting on “energy delivered back to the grid or facility (kWh)” is not applicable to many of the use cases and infrastructure that would be deployed in this program. Chargers that have this capability are currently being piloted rather than operating at scale.. The vast majority of cases will not deploy bi-directional and reporting for this field will not be possible. Thus, fields such as this should be an optional requirement. Given this, EVCA respectfully suggests making these two reporting fields optional.

3. **A 10 mile distance to another DCFC is too restrictive, and CEC should therefore weigh applicants based on distance to other chargers, but not disqualify chargers within 10 miles of another DCFC.**

CEC proposes that applicants be further than 10 miles from another DCFC for the rural solicitation. While EVCA respects the intent, this requirement is challenging in practice due to possible real estate constraints. Additionally, given the large number of DCFCs currently under development, it is possible that an applicant would apply to for this solicitation in Q4, and by the time an application is scored, a new DCFC could show up as “under development” on PlugShare or be made live. Applicants are unaware of their competitor’s build plans, and this requirement will be challenging to implement. Instead, EVCA respectfully suggests the CEC develop a scoring rubric that will weigh, but not require, proximity to other DCFCs, site amenities, distance from the highway, and other metrics.

4. **To close the charging infrastructure gap in urban, high density areas, the CEC should amend gating public accessibility site eligibility requirements.**

As the CEC works to address gaps in charging infrastructure in MFD areas, it should also evaluate the potentially restrictive program requirements that may unintentionally exacerbate this shortage of charging infrastructure in dense urban areas where MFDs predominantly exist. A prime example of this is that for many CEC programs, site eligibility requires that a site have 24/7 public access. While EVCA advocates that a good customer experience and station accessibility is paramount to enabling EV adoption, 24/7 access can severely limit the viability of many sites in areas where there are real estate and access constraints. These areas are also where these identified charging gaps exist. 24/7 access to a lot is rarer in urban areas where parking is predominantly in parking garages or mixed-use developments that may have gated access, especially at night outside of business hours. This renders many otherwise prime charging locations as ineligible for funding. In order to close the identified gap in charging infrastructure where it’s needed most, EVCA respectfully suggests that the CEC reevaluate the need for 24/7 access to sites and would instead recommend requirements that sites be open to the public for at least 16 hours per day.

Conclusion

We appreciate the CEC allowing stakeholder feedback as it develops its programs, and EVCA would underscore the importance of continued collaboration as the state moves forward with potentially historic amounts of funding for charging infrastructure. We look forward to further dialogue with the CEC on this topic for ensuring optimal investments of public funding, addressing any technical questions, and providing additional information to staff.

Thank you for your consideration and we look forward to our continued partnership in realizing California's transportation electrification goals.

Best,

Dylan Jaff
Electric Vehicle Charging Association