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EVgo Comments on Multifamily and Rural Solicitations

Additional submitted attachment is included below.

July 13, 2021

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

RE: EVgo Comments on Docket Number 20-TRAN-04 on Light-Duty Electric Vehicle Infrastructure Projects for Rural and Multi-Unit Dwelling Residents

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 through sustained investments in light duty charging infrastructure.

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 across 34 states, including over 300 fast charging locations in California, EVgo serves more than 250,000 customers across the country.

EVgo thanks the Energy Commission for hosting its recent workshop on charging solutions for both multifamily and rural applications. 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
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1. **<u>Specifically for DCFC, a 3 mile distance is more appropriate than a half mile for the multifamily solicitation given EV driver behavior and real estate constraints.</u>**

EVgo applauds the CEC for prioritizing a multifamily solicitation to help promote equitable access to charging infrastructure for apartment dwellers without access to home charging or onsite parking, as well as to meet the charging infrastructure shortage in urban areas as noted in the CEC's 2020 SB 1000 report.[1] Data from the UCLA Luskin Center shows that apartment dwellers are overwhelming using public fast charging as their primary fueling source.[2] These locations are often at grocery stores, retail centers, and other locations where EV drivers can integrate fueling into their regular errands.

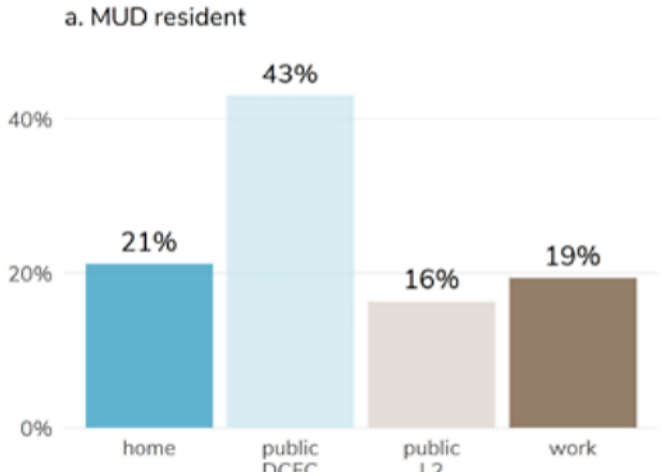

Figure 1: UCA Luskin Report responses for primary charging location for MUD residents

The UCLA study found that drivers prefer a <10 minute drive time and locations with ample amenities to charge their vehicles. A half mile requirement for DCFC, therefore, would be too stringent and would omit many of these eligible locations which are shown by the study to be ideal for DCFC for apartment-dwelling residents without access to home charging. EVgo therefore recommends a 3 mile threshold, or <10 minute drive time for eligible locations under the multifamily solicitation, and that the scoring rubric be adjusted to include locations with ample amenities to improve driver experience.

[1] California Energy Commission, *SB 1000 Electric Vehicle Charging Infrastructure Deployment Assessment,* https://efiling.energy.ca.gov/GetDocument.aspx?tn=236189&DocumentContentId=69167

[2] 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

2. **<u>EVgo recommends that CEC weigh execution ability and project readiness heavily in its scoring for both solicitations and look to the Bay Area Air Quality Management District (BAAQMD) as a best practice.</u>**

To avoid applicant attrition, EVgo recommends that CEC heavily weight project readiness and look to BAAQMD as a best practice.[3] BAAQMD prioritizes shovel-ready projects (e.g. those ready to start construction) in their applicant review.

BAAQMD also prioritizes execution ability by only allowing applicants with a "proven track record of overseeing the procurement, permitting, installation, and maintenance of at least 20 DC Fast Chargers and/or 100 level 2 chargers at three or more different property locations and for three or more different customers in California since January 1, 2018."

3. **<u>In assessing locations under the rural solicitation, CEC should develop a more robust scoring rubric, looking to North Carolina as a best practice.</u>**

EVgo thanks the CEC for soliciting feedback on its scoring rubric. EVgo suggests a more robust points system to weigh applications. For example, instead of a binary requirement for 10 miles from another DCFC, which could be limiting given available real estate and readily available site hosts, EVgo recommends a point system (i.e. 3 points for 10 miles from another DCFC, 2 points for 5 miles from another DCFC, 1 point for 1 mile from another DCFC). Access to amenities for drivers, such as restrooms, food, local restaurants, and retail, should also be heavily weighed. EVgo recommends that CEC explore a scoring rubric from North Carolina as a best practice.[4]

4. **<u>Amend public accessibility requirements to close the charging gap in urban areas.</u>**

As noted above, the SB 1000 report found a shortage of charging in dense urban areas. One reason for that is that other CEC programs require 24/7 access, which is less common in urban areas that tend to have fewer open service lots than less dense areas (e.g. suburbs and rural areas) and are more likely to have mixed use development, which often have night gates outside of business hours, such as from 12am – 5am.

Given that most charging on EVgo's network takes place between 9am and 6pm, requiring 24/7 access could remove several eligible site locations that would otherwise see high utilization from EV drivers. Again, BAAQMD is a best practice as another program that does not require 24/7 access.[5]

In order to maximize eligible locations in dense urban areas, EVgo recommends that sites be required to be open to the public at least 16 hours per day, 350 days per year (to expand eligibility to public garages,

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[3] https://www.californiavwtrust.org/wp-content/uploads/VW-Mitigation-Trust-EV-LDI-Final-Solicitation.pdf

[4] https://files.nc.gov/ncdeq/Air%20Quality/motor/grants/files/VW/North-Carolina-Volkswagen-Settlement-ZEV-DC-Fast-Charging-RFP-Phase-1-061719.pdf

[5] BAAQMD requires that charging stations be available for use at least 250 days per year and for at least 8 hours per day during normal business hours. For more information, see: https://www.californiavwtrust.org/wp-content/uploads/VW-Mitigation-Trust-EV-LDI-Final-Solicitation.pdf

for example, which would see high use but may be closed on holidays such as Christmas and New Year's, for instance).

5. **Type of vehicle charged is not data that CEC or electric vehicle service providers (EVSPs) can accurately report.**

EVgo recommends striking the data reporting requirement for type of vehicle charged. This is not something that EVSPs can collect accurately and may violate customer privacy. Moreover, EVgo recommends that reporting data be allowed to be aggregated on an annual basis.

Conclusion

EVgo thanks the Energy Commission for the opportunity to provide recommendations to the upcoming light duty solicitations, and for their leadership on enabling the infrastructure deployments necessary to meet an all ZEV future. Please continue to consider EVgo as a resource if any questions or further information can be provided.