DOCKETED	
Docket Number:	20-TRAN-04
Project Title:	Electric Vehicle Infrastructure Project Funding
TN #:	238833
Document Title:	Plug In America Comments on Pre-solicitation MUD EV Charging Program
Description:	N/A
Filer:	Jay Friedland
Organization:	Plug In America
Submitter Role:	Public
Submission Date:	7/13/2021 4:01:43 PM
Docketed Date:	7/13/2021

Plug In America
1270 S Alfred St #351268
Los Angeles, CA 90035

July 13, 2021

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

VIA ELECTRONIC FILING
to Docket 20-TRAN-04

Re: CEC Pre-Solicitation Workshop focused on MUD EV Charging

Plug In America welcomes the opportunity to file these comments based on the Staff Pre-Solicitation Workshop held on June 28, 2021. PIA strongly supports the major goals of the MUD EV charging infrastructure program focusing on deploying as much EV infrastructure as possible while enabling the widest access to EV drivers, especially in underserved communities.

We have three major comments:

1) Cost considerations for MUD drivers are very important to the ultimate success of any program. As the staff considers multiple technology options to fund, please consider the ultimate cost to these consumers. For this reason, while proximate DCFC appears to be a viable alternative for MUDs[1], it is really a terrible burden on these consumers, especially in Equity communities. In a study from EPRI[2], DCFC costs were as high as $0.70 per kWh and averaged $0.41/KWh. This means that the consumers who can least afford higher transportation costs are paying the equivalent of $5/gal on average up to $8/gal[3]. The real benefit of transportation electrification is capturing the relatively low cost of electricity at home and delivering it to consumers, with significant savings each year.
2) We agree with our colleagues from EV Charging Access for All, Ecology Action, and others, J1772 cords on equipment should not be required, allowing technology like new smart plugs to provide access to EV charging at the lowest possible cost.
3) Finally, we believe that the MUD EV charging program should consider possible alternatives to fully networked chargers and use cost-effectiveness as one of the key considerations for future program rollouts. This would help further expand deployment of lower-cost EVSE hardware and increase the number of installed charging stations.

We appreciate your consideration of our recommendations as you further refine the MUD EV Charging solicitation. We would be happy to discuss any these ideas at length with staff.

Sincerely,

Jay Friedland, Senior Policy Advisor, Plug In America

---

[1] Evaluating Multi-Unit Resident Charging Behavior at Direct Current Fast Chargers, UCLA Luskin Center. 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] Presentation on Cost to Charge from the Plugshare Data Set, EPRI. https://www.epri.com/research/products/3002011098

[3] Comparing Energy Costs per Mile for Electric and Gasoline-Fueled Vehicles, INL. https://avt.inl.gov/sites/default/files/pdf/fsev/costs.pdf