

**DOCKETED**

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## **EV Charging for MUD Residents**

*Additional submitted attachment is included below.*

July 13, 2021

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

**Docket: 20-TRAN-04**

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

Dear Commissioner Monahan,

On behalf of EVmatch, Inc. (EVmatch), 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.

EVmatch is a San Francisco Bay Area-based, woman-owned software company that provides innovative electric vehicle (EV) charging software applications. The EVmatch platform allows EV drivers to easily find, reserve, and pay for use of Level 2 EV charging stations at private sites, including residential homes, multi-family properties, and businesses. In collaboration with smart, Level 2 electric vehicle supply equipment (EVSE) manufacturers, EVmatch provides a unique and affordable EVSE sharing solution for renters and multi-unit dwellers, many of whom currently face higher barriers to dedicated home charging. EVmatch is committed to increasing equity in the EV and EVSE industries and has been building products and services to advance these goals since its inception in 2016.

EVmatch applauds the Commission's continued leadership in transportation electrification, especially with its recent focus on increasing EV charging access in multi-family dwellings and rural communities. As a direct EV charging service provider with a focus on MFDs, our comments reflect real-world experience working through the challenges of deploying EVSE in MFDs, ensuring optimal utilization, and balancing the needs of the varied stakeholders throughout the process. EVmatch offers the following recommendations for the CEC's proposed multi-unit dwelling and rural charging grant solicitations:

**Multi-Unit Dwelling Grants:**

- We encourage you to **lower or eliminate match funding requirements** for projects sites in low-income and Disadvantaged Communities (DACs).
- Keep **outreach and assistance** to MUD residents as an **eligible project cost** in the final solicitation. This funding is critical to induce EV adoption, ensure adequate usage of deployed charging assets, and maximize the state's ROI from this grant program. Successful applicants should include EV education and outreach to residents in their proposals, to ensure maximum adoption.

- Require **prominent signage and EV charging pavement striping** for all funded projects and count these items as eligible project expenses.
- **Remove the requirement that applicants must identify the sites proposed for charger installations and have letters of intent (LOIs) or commitment prior to award.** Given the administrative resources required to pre-market this his type of grant program and obtain LOIs from site hosts when funding is unsecured, this requirement unfairly advantages large EVSE network providers and well-resourced building owners. Allowing applicants to complete site recruitment activities after an award has been announced will ensure more equitable distribution of state funds to both small- and medium-sized EVSE service providers and MFD property owners alike.
- **Remove DC Fast Charging (DCFC) as an option at multi-family buildings.** Relative to DCFC, Level 2 charging has lower infrastructure costs, less impact on the electrical grid, and results in lower cost charging to the end-user. As such, this technology should be deployed over DCFC at long-dwell locations, such as MFDs. Taxpayer dollars should not be used to deploy this costly technology in locations that are better suited for lower-power and more cost-effective Level 2 EVSE.

#### **Rural Charging Grants:**

- **Require a minimum of full-power Level 2 EVSE (240V/32A),** as rural residents often need to drive further distances than urban drivers. This requirement also better supports the adoption and utilization of full battery-electric vehicles (BEVs) over plug-in hybrid electric vehicles (PHEVs) in rural communities.
- **Allow non-networked, shared residential Level 2 EVSE** as an eligible technology when coupled with a sharing platform that enables public access, data collection, and reporting. This unique technology deployment model leverages existing electrical infrastructure from residential homes and has the potential to rapidly accelerate access to EV charging in rural communities at the lowest possible cost.
- To support local small businesses and economic revitalization in rural communities, **prioritize locating projects near “Main Street” sites or near tourist destinations,** such as county fairgrounds, outdoor recreation sites (e.g. prominent hiking, biking, camping, or fishing sites), and entertainment venues.

Thank you for the opportunity to provide input on this important matter.

Respectfully,

Heather Hochrein  
 Founder and CEO