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Silicon Valley Clean Energy Comments on Multi-Unit Dwelling Charging Solicitation Concepts

Additional submitted attachment is included below.

Silicon Valley Clean Energy Comments on Multi-Unit Dwelling Charging Solicitation Concepts

CEC Docket Number: 20-TRAN-04

Date: July 13, 2021

Dear Energy Commission Staff,

Silicon Valley Clean Energy (SVCE), a community choice energy agency, is redefining the local electricity market and providing our residents and businesses with new clean energy choices — renewable and carbon–free electricity at competitive rates. SVCE was formed as a Joint Powers Authority in 2016, and now serves approximately 270,000 residential and commercial electricity customers across a service area comprised of the following thirteen communities: Campbell, Cupertino, Gilroy, Los Altos, Los Altos Hills, Los Gatos, Milpitas, Monte Sereno, Morgan Hill, Mountain View, Saratoga, Sunnyvale and Unincorporated Santa Clara County. SVCE has programs for fuel switching to clean, carbon-free electricity in the place of fossil fuels used in transportation, buildings and infrastructure.

As identified and explained in SVCE's 2019 Electric Vehicle Infrastructure Joint Action Plan[1], much of SVCE's focus on transportation electrification has so far been on supporting electric vehicle (EV) adoption in the underserved multi-unit dwelling (MUD) population. SVCE strongly applauds the California Energy Commission (CEC) for launching a grant program specifically supporting this sector and would like to offer some initial learnings observed through SVCE's ongoing efforts.

The five most relevant SVCE programs supporting EV infrastructure at MUDs are:

- FutureFit Assist: EV Charging program[2] is supporting the market transformation of electric vehicle charging infrastructure in multi-unit dwellings (MUDs) and small- and medium-sized business (SMB) workplaces in Santa Clara County. Launched in mid-2020, the program has targeted over 300 hard to reach MUDs and over 300 hard to reach SMBs. To date, there are 29 enrolled customers and SVCE has completed 20 detailed site evaluations. Each site evaluation includes at least three options for feasible charging installations and an estimate of the associated costs.
- A pilot with Ecology Action[3] is being used to validate a direct installation model for EV charging at low- and moderate-income MUDs. These installations are focused on finding the low-cost solutions (including low-power solutions) that meet site needs. Three sites are participating in the pilot and Ecology Action is now performing outreach and education for the tenants to hopefully spur new EV adoption.

[1] https://www.svcleanenergy.org/wp-content/uploads/2019/09/EVI-Joint-Action-Plan_Sept-2019.pdf
[2] https://www.svcleanenergy.org/ev-charging-assist/
[3] https://www.svcleanenergy.org/innovation-ecologyaction/

- A pilot with EVmatch[4] is being used to understand impact of a reservation software platform and shared EV chargers on the viability of deploying EV charging at MUDs. The ability to efficiently share chargers should reduce the number of chargers needed at a site, minimizing costs. Further, the chargers can be opened up to the public to increase the utilization and economic case. Four sites are participating in the pilot and the impact on utilization and tenant experience will be evaluated.
- SVCE co-funded the Peninsula-Silicon Valley Incentive Project under the California Electric Vehicle Infrastructure Project (CALeVIP)[5], along with the CEC and four other local load serving entities. For SVCE's territory, 25% of the funds going towards Level 2 EV chargers will be deployed to MUDs – this carve-out was added to the typical CALeVIP rules to ensure MUDs had a chance to participate in the first-come, first-served CALeVIP grant.
- The Priority Zone fast charger program[6] intends to support MUD residents by incentivizing fast charger installations at or near designated clusters of MUDs (with an emphasis on older buildings that are likely to face more challenges with more typical on-site deployments). The first round of this program offered an incentive which stacked on CALeVIP, but the overall impact on CALeVIP site selection appeared to be low. SVCE is considering adjustments for a second round.

These experiences have given SVCE a close-up look at the challenges multifamily properties are facing and some insight into the types of solutions that could help them succeed in installing EV infrastructure. SVCE submits the following comment for CEC consideration.

Incentivize applicants to include challenging sites in their portfolios

- There is no one typical multifamily property, but rather multiple types that face a set of key barriers (e.g., aging infrastructure, ADA compliance challenges, utilization risks). Public funds should be invested to tackle key barriers that, if unlocked, could be applied to other sites. Common barriers we have seen include aging infrastructure, power capacity constraints, parking configuration and limitations, and reaching economies of scale. Funding programs often emphasize the most ports per dollar spent, but this can result in incentivizing investment in easier sites (which may tend to be newer and/or better-off) and fail to reach sites and tenants who most need help.
- Grant applicants will likely want to focus on the easier sites, so the CEC should emphasize its interest in also incorporating challenging sites in each portfolio by making that a part of the evaluation.
- Small and midsized complexes built before 1990 typically face the most challenges. One way to encourage applicants to include these sites would be to create incentive criteria for inclusion of such sites.
- Including challenging sites in the portfolio wouldn't require conventional charging approaches to be deployed at these sites, if the costs and challenges are truly prohibitive. As explored below,

[4] https://www.svcleanenergy.org/innovation-evmatch/
[5] https://calevip.org/incentive-project/peninsula-silicon-valley
[6] https://www.svcleanenergy.org/dcfastchargers/

support for these challenging sites could be provided through innovative approaches that bypass the major constraints. However, these approaches may not be the lowest possible cost per port. Encouraging a balance of site types across all funded projects will ensure the CEC's dollars are equitably dispersed and provide the best opportunity for innovation and learning.

Allow flexibility in technology types

- Allow for innovation in solutions: low MUD deployment could mean that we don't know the "right" solution yet. Allowing mobile chargers, managed charging solutions, off-site approaches, and other ideas to apply for the grant and validate their approach for MUDs will be most impactful.
- A given site may be best served by a blend of one or more technologies.
- Allowing low-cost solutions (e.g., L1 outlet) may be a better fit for many sites.
- Consider EV telematics or other novel approaches that provide an alternative to requiring networked chargers. For example, SVCE's GridShift: EV Charging program[7] is demonstrating how an app can be used to optimize EV charging for pricing, grid conditions, and carbon using telematics.

Consider utilization requirements carefully

- Requiring utilization, particularly at the outset of an installation, can result in funds going towards sites who already have EVs (and may not have needed as much support). Instead, the biggest value in state funds may be for installing charging at sites with no EVs (i.e., unlocking a new site).
- Allowing innovation in deployment approaches (e.g., make-ready work at outset and then scaling installs over time) and business models/technologies may not result in immediate utilization, but may see more EV adoption over time.
- Requiring utilization data to be tracked and shared with CEC will provide informative data on the impact of installed chargers. If funding must be tied to utilization, extending the target dates for hitting the required thresholds will give more time for EVs to be adopted.
- Utilization requirements should vary by site: the number of units and number of chargers being installed will impact what is a "reasonable" target for usage.

Consider matching funds as well as other "match" commitments

- Match funding will result in a multiplication of the CEC's impact, so considering matching as a part of the evaluation process is logical.
- Allow for innovation with what a "match" can look like – maybe some entities can offer a unique idea/approach to pair with the CEC grant funding (e.g., a city adopting a pilot retrofit mandate for EV charging at MUDs, or a load serving entity offering to include a novel EV rate).

[7] https://www.svcleanenergy.org/gridshift-ev/

Allow a broad range of entities to apply

- Some entities that are very consumer-focused have not been able to apply to some past grants due to various requirements. The CEC should allow all types of entities to apply and then evaluate the applicants.

Overall, there are two main lessons SVCE has learned. First, charging at multifamily is still nascent and maintaining flexibility in both the allowable technology types and business models is crucial at this stage of development. California needs to deploy, learn, and scale simultaneously and that can only be done by supporting flexibility. Second, at this time there is little appetite for upfront costs from property managers. Allowing funds to stack, encouraging matching funds or other commitments to maximize CEC investments, and simplifying the process will be crucial to ensuring the success of this and future programs.

SVCE would be happy to provide more details on its programs and learnings to CEC staff.

Respectfully,

Aimee Bailey

Director of Decarbonization and Grid Innovation Programs

Silicon Valley Clean Energy