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*Comment Received From: Office of Assembly Majority Leader Eloise GÃ³mez Reyes
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Firm Uptime Requirements are Critical for Multi-Unit Dwellings and Rural Charging Solutions

Additional submitted attachment is included below.

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COMMITTEES
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JUDICIARY
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BUDGET SUBCOMMITTEE NO. 2 ON
EDUCATION FINANCE
LEGISLATIVE ETHICS

July 13, 2021

Ms. Patricia Monahan
Commissioner, Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Docket: 20-TRAN-04

Re: Firm Uptime Requirements are Critical for Multi-Unit Dwellings and Rural Charging Solutions

Dear Commissioner Monahan,

Thank you for your continued leadership as the lead commissioner on transportation to ensure increased deployment of vehicle charging stations across the state in fulfillment of our 2025 zero-emission vehicle infrastructure goal. The Commissions grants for deployment of chargers at multi-family dwellings (MFDs) and in rural areas addresses an important gap as we work to ensure all communities benefit from EVs. In a greater effort to ensure reliability and certainty, it is respectfully requested that the uptime requirement for charging stations be set at 97% for the Multi-Unit Dwelling grant instead of a 95% goal.

I applaud your plan to dedicate 50% of this funding to low-income communities (LICs) and disadvantaged communities (DACs). As you know, my district in the Inland Empire is disproportionately impacted by air pollution and most of my constituents reside in a DAC. I authored Assembly Bill 1389 this year to codify the 50% requirement in statute and to also specify a policy framework guiding how LICs and DACs can benefit from clean transportation projects deployed in their area.

Of concern is that deploying charging solutions in LICs and DACs is only half of the solution – we need to ensure that they also work well and are accessible to drivers when most needed. I am encouraged to see a 95% uptime “goal” in your MFD grant. However, I would respectfully encourage you to: 1) increase this number to 97%, and 2) make it a firm requirement, as opposed to a goal.

As we try to make EVs more mainstream and accessible to lower-income communities, ensuring charging stations are reliable is critical to creating a positive consumer experience. In LICs and DACs where charging stations are

scarcer, every interaction with a charging station helps shape the driver's perception regarding convenience of use and availability. I want my constituents to see that EVs and charging are a great fit for their everyday work and travel needs, but they need to be assured that the technology will be convenient and reliable.

This issues are magnified in rural areas, where there are fewer stations and drivers have to travel further for everyday needs. Once again, many of these communities perceive EVs to be a technology that is out of their reach or doesn't fit their needs. I would likewise encourage you to institute a 97% uptime requirement for the rural grant opportunity. We cannot risk stranding drivers in rural areas. We sincerely appreciate the inclusion of a requirement for one back-up charger, but would encourage additional chargers to reduce the real fears of "range and charger anxiety."

Your work is critical to creating consumer confidence in this technology, and I applaud your success to date in deploying infrastructure solutions to address my district and other communities' needs. I look forward to partnering with you on helping the state meet its climate goals.

Thank you,

A handwritten signature in black ink, appearing to read "Eloise Gómez Reyes". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Assembly Majority Leader
Eloise Gómez Reyes
47th Assembly District