

DOCKETED

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Acterra Public Comment

I'm Jared Johnson, a resident of SF and the Senior Manager of Policy & External relations for Acterra. Current and proposed future building codes are stacked against residents of multi-family housing and rural communities. Currently only 10% of parking in brand-new multi-family housing is required to be wired for EV charging, vs. 100% of single-family housing. So, on behalf of my organization I want to thank you CEC for focusing on these as target populations for EV infrastructure.

We are in an accelerating climate crisis, and California is nowhere near meeting its ambitious EV goals. The CEC should require 1) ubiquitous EV charging wherever possible, and 2) the most charging spaces per dollar be delivered on this investment.

Equity demands that low-income communities get access to low-cost charging, 50% of EV charging currently happens on level 1 chargers at home, using a simple 110v outlet. This is the lowest-cost charging option and needs to be made available to low-income communities. With this in mind

Using "chargers" as an eligibility requirement automatically jacks up the price, limiting the number of low-income people who will benefit from this public spending. Please change the project's overall goals to read, "Successful outreach, installation, and use of chargers low-cost charging, particularly in: Disadvantaged and/or low-income communities and Affordable housing units". Using "chargers" as an eligibility requirement automatically raises the price, limiting the number of low-income people who will benefit from this public spending.

Also the CEC should recognize that installation costs depend on use cases, and can vary widely. Projects that require trenching and putting additional power supplies online will almost certainly be more expensive than utilizing solutions whenever possible that don't require panel upgrades. Project teams should be required to include local community-based groups representing local, low-income and/or POC communities, because these groups understand the communities best and their involvement will help to ensure appropriate outreach and EV adoption. Additionally, we implore the CEC to include protections for tenants as a requirement for low-income/disadvantaged community site participation, to ensure the cost of housing does not increase once charging is installed.

Speaking of costs, data collection comes at a price, which may not serve the project's priority objectives. The CEC needs to clarify and focus on this project's objectives in order to make informed trade-offs. For example, bidirectional charging might be a nice-to-have, but its high cost would affect the number of charging spaces that are available, and that trade-off seems to cut against the objectives of this

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Other technical changes to reduce cost can include; **removing the requirement that all Level 1 chargers must be equipped with SAE standard J1772 connectors, removing the requirement that all chargers installed must be network capable** (a recent Sacramento Municipal Utility District pilot instead relied on electric meters and the utility's communications backbone, rather than 'networked' chargers to keep cost down); and **removing DC Fast Charging (DCFC) as an option for multi-family charging** (lots of money is already being spent on extending the DCFC networks; however, access to low-cost ubiquitous at-home charging for multi-family and low-income residents is a gaping hole in California's infrastructure)

Thank you for taking the time to read through these suggestions and I urge the CEC to focus on expanding our charging infrastructure so it can serve as many residents of disadvantaged and/or low-income communities and affordable housing units as possible.