DOCKETED	
Docket Number:	21-ALT-01
Project Title:	2021-2022 Investment Plan Update for the Clean Transportation Program
TN #:	239889
Document Title:	EVgo Comments - on Clean Transportation Program 2021-2023 Investment Update
Description:	N/A
Filer:	System
Organization:	EVgo
Submitter Role:	Public
Submission Date:	9/30/2021 1:51:58 PM
Docketed Date:	9/30/2021

Comment Received From: EVgo
Submitted On: 9/30/2021
Docket Number: 21-ALT-01

EVgo Comments on Clean Transportation Program 2021-2023 Investment Update

Additional submitted attachment is included below.

September 30, 2021

Ms. Patricia Monahan
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

RE: EVgo Comments on CEC Clean Transportation Program 2021-2023 Investment Plan Update - Revised Staff Draft

Dear Commissioner Monahan and Staff:

EVgo commends the California Energy Commission (CEC) for its leadership in helping the state meet its climate and zero emission vehicle (ZEV) goals through sustained and equitable investments in EV charging infrastructure.

With more than 800 fast charging locations, EVgo's owned and operated charging network serves over 68 metropolitan areas across 35 states and more than 300,000 customer accounts. Headquartered in Los Angeles, EVgo's fast charging network includes over 300 fast charging locations in California.

EVgo thanks the CEC for releasing its revised staff draft Clean Transportation Program (CTP) Investment Plan Update for 2021-2023 and holding a public workshop to collect stakeholder feedback on the most effective ways to deploy charging efficiently and equitably. California passed a historic ZEV package that will bring further investments to bring electrified transportation and cleaner air benefits to all Californians. The Clean Transportation Program, augmented by the ZEV package, is the state's number one tool to scale the deployments needed to meet California's goals for 100% ZEV sales beginning in 2035, and 1.5 million charge ports by 2030.[1] [2]

Below, EVgo respectfully submits the following comments for the CEC to consider as it moves forward with its CTP Investment Plan update. EVgo looks forward to being a partner to the CEC in pursuit of a fully electrified transportation sector and welcomes itself as a resource should any questions arise.

Best,

Adam Mohabbat
Manager, Market Development
adam.mohabbat@evgo.com

---

[1] Executive Order N-79-20, https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf
[2] *Assembly Bill 2127 Electric Vehicle Charging Infrastructure Assessment - Analyzing Charging Needs to Support Zero-Emission Vehicles in 2030 (Commission Report),* California Energy Commission, July 2021.

1. **<u>To deploy funding as efficiently as possible, the CEC should provide the market clearer funding signals on timing and structure of upcoming infrastructure programs, and fund waitlisted sites in past CALeVIP solicitations until a successor program can be implemented.</u>**

In the 2021 state budget, California allocated a historic ZEV Package to California Air Resources Board (ARB) and the CEC to invest in transportation electrification. As part of this package, the CEC received a $500 million dollar allocation from the general fund to help close the gap on charging infrastructure in the state. The CEC reflected this in the investment update plan for this fiscal year, proposing to allocate a total $288 and $220 million dollars in light duty and medium-and-heavy duty electric vehicle charging infrastructure categories, respectively.

While the investment update provided a framework for types of funding programs market participants can expect in from this large funding infusion, *it did not provide further detail on specific programs the CEC plans on releasing this year and the timing of those programs*. By providing clarity on expected program design and launch timeframes, including the successor programs for CALeVIP, market participants can better align their siting and application efforts, ultimately leading to more shovel-ready projects and reduced attrition, further reducing deployment delays. EVgo recommends the CEC provide, to the furthest extent possible, additional details in their next revised investment update on the timing for new programs, with much advanced noticed into schedule as possible. This is a best practice and would align with other programs that do the same across the country.[3]

Further, if there is expected to be a gap in charging deployments between the CALeVIP Alameda County solicitation and the CALeVIP successor program, EVgo recommends that CEC look to fund sites waiting in the queue from past CALeVIP solicitations. As it stands today, EVgo alone has dozens of shovel ready projects that have been waiting in the CALeVIP queue for months, or over a year, while many potentially more speculative applications are clogging the queue. Given that many applications with projects have been waiting for the queue churn to move forward, this would be a wise use of deploying funding on an interim basis while a longer successor program can be implemented.

2. **<u>If the funding allotments for charging infrastructure are not spent in one year as planned, CEC should consider fulfilling backlogged programs and share a clear contingency plan for unspent funds.</u>**

As mentioned above, the CTP Investment Plan revise incorporated the $500 million dollars from the general fund into charging infrastructure categories for the current fiscal year. In the update, CEC staff states that "it is vital to front-load funding to ensure the public adoption of ZEVs is not stymied by lack of infrastructure."[4] This sentiment was echoed by members of the CTP advisory committee at the public workshop on September 16th. EVgo commends the CEC on its goal of deploying the funds as quickly as possible; however, this year's funding is two to three times the scale of any given years CTP investment. Further, since the inception of the CALeVIP program, CEC has never fully issued all funds for a given project due to program design issues and a long list of site applications clogging the queue has led to an extended waitlist. For

---

[3] Charge Ahead Colorado has three solicitations per year, which always take place in the same three months, allowing for predictable development cycles. Pennsylvania and the Maryland Energy Administration have taken a similar approach. For more information on funding best practices, see: https://site-assets.evgo.com/f/78437/x/2a8b3fcecb/connect-the-watts_public-funding-best-practices.pdf
[4] California Energy Commission, Docket Number 21-ALT-01, *2021–2023 Investment Plan Update for the Clean Transportation Program*, pg. 10

example, the CEC's Southern California Incentive Program launched in 2018 has only issued $13 million of the program total of $29 million despite a 12-month energization requirement.[5] Given this, as well as the expected lag time between CALeVIP and its successor programs, CEC should be prepared for the possibility that this funding does not get encumbered in one year.

Similarly, while there is large scale deployment in medium duty fleets, heavy-duty vehicles technologies have not been deployed demonstrably at scale. There may be benefit in spacing out funding to account for evolving technologies in this space and a true possibility that all funds will not be exhausted given limitations in rolling out vehicles, including the continued chip shortage for new vehicle deployment.

EVgo recommends that the CEC keep stakeholders and market participants updated on any delays in program funding, including gaps between CALeVIP and its successor programs. Similarly, EVgo echoes the points above that unused funding could be used to move forward past CALeVIP applications stuck in the project queue that are shovel ready in the pipeline but are being held up for lack of funding.

Additionally, should the funding not get spent in the current fiscal year, EVgo would suggest a clear plan on how the funding will be reflected in the following year's CTP Investment Plan update, with specific guidance on how it will be allocated into programs so that applicants may adequately prepare. The Commission's change to a multi-year investment plan approach works to this benefit.

3. **The CEC should account for the federal infrastructure package in its investment plan updates, and Clean Transportation Program investments by the CEC should be complementary to federally funded programs by focusing on community charging.**

California has led the way on investments in zero emission vehicles and charging infrastructure and has an opportunity to leverage federal funding an infrastructure bill is passed in Congress. If passed, up to $7.5 billion dollars could be allocated to EVSE, much of which will filter down to state DOTs through formula grants. As it stands, California's currently proposed formulaic allocation of $383 million looks to be distributed to Caltrans and primarily geared towards highway corridor charging programs.

Beyond sharing best practices, the Commission should ensure that all investments made by the CTP are in fact complementary of this federal corridor funding, and include more community charging programs, which may only receive up to one-sixth of the federal infrastructure bill's charging funds. Such programs may include multiple funding rounds for the multifamily and TNC programs, both of which are creative solutions that look to tackle innovative use cases for EV charging. However, further programs focused on highway corridors may be unnecessary if the corridor-heavy infrastructure bill is passed.

For example, the CEC is set to launch its Multi-Unit Dwelling (MUD) and Rural solicitations in late 2021. Federal programs, if passed, will already cater to the rural corridors envisioned in the rural solicitation. EVgo, therefore, recommends that the CEC should focus its investments where funding and deployment is still lagging and where federal funding is not envisioned, including the shortage of public charging in high density areas as opposed to low density areas, as noted in the December 2020 SB 1000 report.

---

[5] https://calevip.org/incentive-project/southern-california