

DOCKETED

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EVCA Comments on 2021-23 CTP Investment Plan Update

Additional submitted attachment is included below.



Electric Vehicle Charging Association

INNOVATION FOR CLEAN MOBILITY

September 30, 2021

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

Re: EVCA Comments on the Updated 21-23 CTP Investment Plan

Dear Commissioner Monahan,

Thank you for the opportunity to comment on the 2021-2023 Investment Plan Update for the Clean Transportation Program, which allocates historic funding allocations from the 2021-2022 State Budget.

The Electric Vehicle Charging Association (EVCA) is a not-for-profit trade organization of twelve leading electric vehicle (EV) charging industry member-companies and one zero-emission autonomous fleet operator. EVCA's mission is to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the expeditious and efficient adoption of EVs and deployment of EV charging infrastructure.

The Governor's and Legislature's agreement to allocate significant funding for zero-emission vehicle (ZEV) infrastructure in the budget is historic for our industry. This funding will be critical to stimulating the ZEV market and advance the state's progress in achieving its climate, ZEV, and ZEV infrastructure deployment goals.

To ensure the state and our industries fully realize these benefits, thoughtful and expeditious roll-out of this funding will be critical to grow this sector. Therefore, we respectfully offer the following guidance for your consideration as the Energy Commission ("Commission" or "CEC") decides how to allocate this funding:

- **Prioritize infrastructure deployment.** Because of Governor Newsom's executive order to phase out the sale of new gas-powered vehicles by 2035, the amount of public infrastructure needed to achieve this will be significant – approximately 1.5 million

chargers according to the CEC's latest infrastructure assessment. These numbers are even greater when considering infrastructure needed to support medium- and heavy-duty electrification. Given the significant gaps in infrastructure currently, and the dire need to rapidly scale this market to meet our climate and statewide deployment targets, we respectfully recommend your agency use most of these funds to put infrastructure in the ground.

- **Release funding quickly by expanding existing rebate programs.** EVCA supports the CEC's goal to deploy its allocated funds as quickly as possible. The CEC's rebate programs (e.g. CALeVIP and EnergiIZE) are critical tools to making funds more quickly available to companies. To more rapidly stimulate this industry and scale-up our infrastructure, we respectfully recommend augmenting CALeVIP and EnergiIZE significantly. Companies will more quickly benefit from these funds if they are able to access them quickly through streamlined rebate programs. EVCA acknowledges the wind-down of the current CALeVIP program following the upcoming Alameda County project. We would encourage the CEC to launch the successor CALeVIP program in an expeditious fashion to release this funding for the 2021-2022 fiscal year. If there is a gap between these programs, EVCA would respectfully recommend the CEC use a large portion of this funding for the fiscal year to fund the backlog of projects on the CALeVIP waiting list.
- **Target infrastructure deployment in areas of greatest need.** Additional charging infrastructure will be needed throughout California as EV adoption increases. The CEC should support programs in a variety of areas including, but not limited to what is detailed below. However, it is important to underscore that while not guaranteed, the California Department of Transportation (Caltrans) will likely receive significant funding from the federal government's bipartisan infrastructure package, which currently proposes \$7.5 billion dollars for EVSE. . We respectfully encourage the CEC to consider these impending investments, which will likely focus on alternative fuel corridors, when deciding where to allocate its funds for each of the areas below and ensure its funding opportunities build on top of other investments to produce a stronger ecosystem . The CEC should ensure its allocations are optimized to equitably and evenly distribute stations to address various communities' needs.
 - Urban Areas. The CEC's AB 2127 infrastructure assessment and SB 1000 reports concluded that more charging exists in low population density areas and that chargers can be rare in dense urban residential tracts, which can overlap with disadvantaged and low-income communities. We encourage the CEC to ensure that funding is available to California's urban areas to guarantee that all electric vehicle drivers and business models will have access to charging infrastructure in downtown cores, near connected transportation such as airports and rail stations, near multi-family dwellings, and at fleet depots. This can be achieved through both targeted rebates and grant programs. We support grant concepts like the CEC's CARTS program to ensure that urban geographies and new high-mileage mobility applications, like transportation network company drivers and

autonomous vehicle fleets, have access to charging. The CEC's focus on urban areas and use cases will also help accelerate and support implementation of the Clean Miles Standard - particularly in minimizing the negative impacts to drivers and riders of ZEV ridesharing services stemming from insufficient charging infrastructure, as recognized by the authorizing legislation (SB 1014, Skinner).

- Disadvantaged Communities. No community should be left behind as the state transitions to ZEVs. The Commission's planned funding to deploy infrastructure in disadvantaged communities is an important step to ensure all communities benefit from electrification. We encourage the Commission to consider the unique needs of these Communities when developing programs, which could include additional resources to develop applications and longer timelines to secure project partnerships. EVCA supports the CEC's continued ongoing SB 1000 analyses and recommends their use to help guide infrastructure investments and funding to ensure adequate coverage for ZEV drivers and business models.
- Rural Communities. California's rural communities are critically important to the State's economy and identity. The CEC's already planned funding for rural charging set to launch at the end of the year to deploy infrastructure in these communities is an important step. We encourage the CEC to continue to track potential federal investments in rural and corridor charging and ensure funding availability to California's rural communities to guarantee that all drivers have access to charging infrastructure.
- **Consult industry to develop a standardized reporting formula for infrastructure "downtime"**. SB 129 requires reporting of "average charger or refueling station downtime" over a 12 month period for all infrastructure it funds, consistent with the Commission's ZEV Market Development Action Plan to measure and track reliability. We respectfully recommend the Commission develop a formula for all funding recipients to use to report infrastructure downtime. This will ensure standardized reporting of information that more accurately describes the reliability of publicly funded infrastructure, otherwise the Commission could receive inaccurate data that undermines its analysis.

Thank you for your consideration,

Dylan Jaff
Government Affairs
Electric Vehicle Charging Association