

**DOCKETED**

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**Peninsula Clean Energy Comments on the December 2021 CEC  
Staff Workshop for Electric Vehicle Projects -Docket No 20-TRAN-  
04**

*Additional submitted attachment is included below.*



December 16, 2021

**Re: Peninsula Clean Energy Comments on the December 2021 CEC Staff Workshop for Electric Vehicle Projects - Docket No. 20-TRAN-04**

These comments, submitted on behalf of Peninsula Clean Energy, build upon prior [comments](#), previously submitted in January 2021, and answer specific questions posed by staff in regards to future electric vehicle (EV) projects.

In general, Peninsula Clean Energy supports the EV infrastructure projects outlined in this docket and thanks CEC staff for their hard work.

**Local Government Fleets**

Public fleet managers face enormous challenges when seeking to electrify their fleets. These include inflexible public procurement processes, particularly for construction projects, limited staff and budget resources, and unfamiliarity with EV charging installation projects. Dedicating CEC resources to help public fleet managers will provide much-needed assistance for these projects, especially when fleet projects don't easily align with other rebates or funding that are often restricted to specific vehicle or charging types. In general, CEC resources for public fleets should be as flexible as possible to be most effective. Flexibility also allows for other organizations to layer additional assistance, such as Peninsula Clean Energy's upcoming Public Fleets program, which will help public fleet managers plan for fleet electrification, design EV charging projects, and navigate funding opportunities.

1. Restricted fleet charging or include public charging?

Funding for public fleet projects should be as flexible as possible to allow fleet managers to accommodate their various fleet depot setups. The CEC should not require that these projects include public charging. However, additional incentives for fleet charging that can double as public charging may be appropriate.

2. First-come, first-served? Or competitive solicitation?

The application process for this funding should be simple, easy to understand with clear funding amounts, and available on a first-come, first-served basis. A complex and competitive application process that requires detailed project narratives in order to secure funding, available only during specific timeframes, would be a major barrier to

fleet managers and would not allow them the flexibility to apply as they are ready to move forward.

3. Equity by air district? By region? By size?

Allocations by Air District or region could be appropriate to ensure that funding could be distributed to local government fleets across the state. However, the CEC should instead encourage fleets to apply for and utilize these funds quickly, regardless of their location. Public fleets, in general, are very early in the process of transitioning their fleets to EVs. Building momentum and showcasing case studies of public fleets that have started making progress towards electrification is critical at this stage. These examples would be informative for other fleet managers considering electrification and instill confidence in various vehicle types and charging configurations.

4. Reward implemented streamlined permits for chargers?

The CEC should not reward public fleet funds based on permit streamlining for EV charging. These are completely separate functions as public fleet managers do not have direct control over permit streamlining. This would require separate parallel efforts by other municipal departments and boards and would create even longer lead-times for managers to secure these funds and delay fleet electrification. Furthermore, permits are only a minor component of a much larger and more complex schedule and process to install EV chargers for public fleet managers. It would therefore be inappropriate to issue funding based upon a metric that fleet managers cannot control and would make the application process so burdensome as to dissuade them from applying for funding.

5. Should fund the whole electric supply or just the vehicle charging?

Eligible expenses should be as flexible as possible without duplicating otherwise available funds. The application process should allow fleets managers to stack incentives as a complete funding package for projects. Eligible costs should include the incremental cost between EVs and their conventional replacement, EV charging equipment, installation expenses, supporting installation materials such as panels, conduit, trenching, etc., and energy management subscriptions for a set duration (e.g. one year).

### **Considerations for Low-Income Residential Charging**

1. How can we provide EVSE options to garage-less or driveway-less residents?

A primary focus of near-term funding should be for quickly scalable, widespread access to EV charging options. Access to EV charging at home is often the least expensive type of charging retrofit project and provides the confidence in the availability of charging that is critical to encourage potential EV drivers to purchase an EV. As such, it is appropriate that most of these funds support low-income residents at multi-family housing by providing charging options where they live. These options should emphasize

low-cost, quickly scalable technologies such as Level 1 and power-managed Level 2 charging at assigned and shared parking spaces at multi-family housing.

In addition, the CEC should continue to provide support for destination charging and DCFC as a way to support EV drivers without access to off-street charging. Curbside charging may play a role in targeted areas but should be done in close coordination with city and other local agencies.

2. What are the best approaches to low-income verification?

The CEC should coordinate with other income-based programs to minimize the application burden for low-income residents. For example, in Peninsula Clean Energy's "[E-Bikes for Everyone](#)" program, which was exclusively available to residents with low to moderate incomes, applicants were able to use proof of enrollment in other income-based programs, such as CARE/FERA, to streamline their application. This ensured that customers had an easier pathway to participate in the program.

3. When focusing on low-income communities, how can we avoid green gentrification?

EV charging solutions need to focus on highly scalable strategies for multi-family housing residents, including Level 1 and power-managed Level 2 charging. Programs should utilize these strategies to provide charging to 100% of residents at multi-family housing properties at once. In this way, CEC could ensure that funding provides the broadest access to charging for MUD residents. CEC could also create additional incentive options for affordable housing. Other programs that focus on EV adoption should heavily encourage participation of local community-based organizations for implementation.