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NCPA Comments on Light-Duty EV Funding Allocations

Additional submitted attachment is included below.



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California Energy Commission
Fuels and Transportation Division
715 P Street
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DOCKET: 20-TRAN-04

Submitted via electronic commenting system for docket 20-TRAN-04

Re: Northern California Power Agency's Comments on Light-Duty Electric Vehicle Infrastructure Funding Allocation Workshop

The Northern California Power Agency ("NCPA")¹ appreciates the opportunity to submit comments to the California Energy Commission ("CEC") regarding the Light-Duty Electric Vehicle Infrastructure Allocation Workshop held on December 2, 2021. The CEC's Clean Transportation Program will be vital for the rapid deployment of charging infrastructure needed to meet the state's climate and zero-emission vehicle goals. We greatly appreciate the time and effort it took to provide the draft concepts for funding allocations and the CEC's efforts to quickly leverage this historic opportunity for expanding the state's light-duty electric vehicle (EV) infrastructure.

As outlined in the CEC's AB 2127 EV Charging Infrastructure Assessment, California needs to swiftly expand access to EV charging, and NCPA Members stand ready to support the deployment of needed charging infrastructure. POU's are uniquely positioned to complement the state's transportation electrification efforts by tailoring programs and infrastructure to the specific needs of the communities they serve. POU's are also well-positioned to assist with the deployment of charging infrastructure focused on the needs of priority communities, including low-income, disadvantaged, and rural communities.

I. LOCAL GOVERNMENT FLEET CHARGING

NCPA supports allocating funding for local government fleet electrification. The definition of "local government" should be expanded to clearly include publicly owned utilities, community-owned power entities, utility districts, joint power agencies, and other similar local public agencies.

¹ NCPA was established in 1968 to construct and operate renewable and low-emitting generating facilities and assist in meeting the wholesale energy needs of its 16 members: the Cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara, Shasta Lake, and Ukiah, Plumas-Sierra Rural Electric Cooperative, Port of Oakland, San Francisco Bay Area Rapid Transit District, and Truckee Donner Public Utility District – collectively serving nearly 700,000 electric consumers in Central and Northern California.

Local governments provide a variety of services to a wide range of environments and populations. Funding programs should not unnecessarily limit how charging resources can be deployed to meet a fleet's needs; for example, government fleets may require charging infrastructure situated in secured locations, and therefore not publicly available. Additionally, funding for local governments should consider the entire scope of an infrastructure installation when allocating funds, rather than limiting funding to the EVSE.

Any funding program that aims to support local government investments must take into consideration the timeframe associated with local government budgeting. A competitive solicitation may be a better fit for local government fleets, in recognition of the longer timeframe necessary for many governmental entities. If match funding is required, enough lead-time must be allowed for the government to seek and secure approval for additional funds.

II. MICROGRIDS, RESILIENCY, AND CHARGING

NCPA supports funding to help accelerate the deployment of resilient charging infrastructure in energy-vulnerable communities and at critical facilities. NCPA Members are interested in helping to bring resilient EV charging options to their communities, especially in areas subject to PSPS interruption or wildfire risk. NCPA also supports projects that reduce peak grid demand to reduce cost barriers related to interconnection and capacity upgrades.

NCPA encourages the CEC to keep the funding criteria broad for microgrid and resiliency charging projects. Specific technical capabilities like V2G should not be required, as the technology may not be the right fit for all use-cases and may restrict the replicability of the project. In addition, funds should be open to more than just CEC-funded microgrid projects.

III. HIGH-DENSITY CHARGING AND LOW-INCOME CHARGING

NCPA supports further funding for high-density level 2 charging infrastructure, and recommends including funding options for curbside charging, as it lends itself to high-visibility and convenience. However, the installation and maintenance of EVSE installed curbside may present challenges for some areas, and a variety of strategies will likely be needed when it comes to ensuring that enough Level 2 chargers are available in a dense urban area.

NCPA also supports funding for transportation hubs, as chargers at hubs support increased transit ridership and equitable EV adoption. Transportation hubs are often near multi-family housing, providing a dual charging opportunity. Commuters can charge during the day and nearby residents can charge on nights and weekends. One NCPA member, the Bay Area Rapid Transit District (BART), has transit stations within walking distance to over 16,000 multi-family housing units, including over 2,700 affordable housing units. BART has more than 47,000 parking spaces located at 35 different stations across the Bay Area, many within or walking distance to a disadvantaged community.

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NCPA strongly supports additional funding that would best serve low-income residences, which often face high costs when installing EVSEs in older homes, or may not have a dedicated location available for EVSE installation. Partnering with technical advisors or coordinating peer-to-peer network chargers are potential ways of addressing situations that are not easily served by block grants. In addition, utilities can partner with peer-to-peer networks or low-income-focused programs to offer low-income rates for charging, further reducing barriers to electric vehicle adoption.

IV. CONCLUSION

NCPA greatly appreciates the opportunity to provide feedback on the proposed funding allocations for light-duty electric vehicles. Please contact me at emily.lemei@ncpa.com if you have any questions.

Respectfully submitted,



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