

DOCKETED

Docket Number:	20-TRAN-04
Project Title:	Electric Vehicle Infrastructure Project Funding
TN #:	241054
Document Title:	City of Sacramento Comments - LDV EV Funding
Description:	N/A
Filer:	System
Organization:	City of Sacramento
Submitter Role:	Public Agency
Submission Date:	12/21/2021 4:28:45 PM
Docketed Date:	12/21/2021

*Comment Received From: Jennifer Venema
Submitted On: 12/21/2021
Docket Number: 20-TRAN-04*

City of Sacramento Comments - LDV EV Funding

Please refer to attached comments.

Additional submitted attachment is included below.

*City Hall
915 I Street, Fifth Floor
Sacramento, CA 95814-2604
916-808-5704*

December 21, 2021

Submitted Electronically

Docket 20-TRAN-04
California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: City of Sacramento Comments on December 2021 Workshop for Future Light-Duty Electric Vehicle (EV) Charging Projects

Dear Energy Commission staff,

We commend the Energy Commission for convening a workshop on December 2, 2021, to invite continued discussion on future funding decisions for light-duty vehicle (LDV) charging needs. We felt the workshop was responsive to comments raised in our letter dated January 11, 2021 (TN# 236271, Docket 20-TRAN-04), in which we encouraged more transparency and engagement for input on CEC EV infrastructure investment and planning. Thank you for the opportunity to share feedback.

We acknowledge many of the important concepts from the workshop that anticipate a strong role for local government in future LDV EV charging infrastructure projects. Please find our responses to several funding categories and workshop questions below.

Local government fleet charging. We are pleased to see this funding concept included. While Sacramento and many other local agencies are actively advancing fleet electrification, funding for public fleets is generally more limited. We strongly advocate for more funding to support public fleet electrification. However, a 50% match requirement may serve as a barrier to agency participation. Fleet replacement cycles and budgets could challenge public agencies to meet this level of match. If the funding is awarded via competitive solicitation, it's challenging for public applicants to use an application as the basis for a local budget commitment, just to be eligible to compete with no guarantee of an award. We recommend no more than a 25% match share requirement, provided that in-kind staff time is eligible as match.

Restricted to fleet charging or include public charging?

- We think there's merit in a program that prioritizes or is limited to fleet charging, recognizing that many grant programs are available for public charging. The federal Infrastructure Investment & Jobs Act will create \$7.5 billion for public charging, with no commensurate funding for public fleet charging needs (pending further clarification of the definition of "public" chargers).
- Tight local budgets often challenge public agencies like ours to accelerate fleet replacements with zero-emission options; while we have replacement cycles to fund vehicle replacement costs, we often do not have adequate budget for EV infrastructure to support these replacements. Additional funding is often needed. Although rebates are available, they are typically inadequate to cover the additional backup electrical infrastructure and service that's needed.
- As the operator of a fleet and corporation yard, agencies like ours are poised to move quickly to install chargers. Our fleet needs also provide stronger certainty of EV supply equipment utilization. Our fleets will provide sustained demand that can help accelerate market deployment.
- Our vehicles service the community; cleaning the fleet fuel mix improves the air quality of the neighborhoods that we serve, which includes census tracts designated as the most disadvantaged in California.

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

- We recommend a competitive solicitation that provides adequate time for response. This approach allows the CEC to identify the most EV-ready fleets that are poised to successfully deploy EV charging infrastructure and maximize community benefit. A first-come, first-serve approach may reduce some barriers to funding, but does not ensure allocation to the places that need it most, or that are most prepared to successfully implement funding.

Equity by air district? By region? By size?

- We recommend an equitable approach to fleet charger funding. Consider an approach that ensures investment across regions in the state, but also prioritize based on regional air quality benefits; consider prioritizing regions with the state's worst air quality or aligning investments with AB 617 planning efforts.

Reward implemented streamlined permits for chargers?

- Yes, we recommend use of streamlined status to acknowledge agencies that have complied with state requirements established by AB 1236, and to incentivize compliance. Funding eligibility can serve as a powerful tool for staff at local agencies that may not otherwise prioritize AB 1236 compliance, where stricter enforcement mechanisms are absent.

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

- Funding should cover the full costs of installation, including necessary electrical service, trenching, flatwork, and staff time. Without covering these costs, local agencies may face barriers to participate. While chargers themselves can be relatively affordable, these

additional costs can be challenging to fund, hence resulting in projects that never get off the ground.

High-density level 2 charging. The City of Sacramento has prioritized and supported the three high-density concepts outlined in this proposal. Importantly, we have a few flags for the CEC's consideration below:

- **Curbside charging:** although CEC staff included this as a potential high-density solution, we refer staff to the City of Sacramento's experience with curbside charging (more online: <http://www.cityofsacramento.org/Public-Works/Electric-Vehicle-Initiatives/Curbside-Charging>). Specifically, at this time the City of Sacramento has reserved curbside charging for fast-charging only, since it supports the turnover that the City has prioritized for our in-demand curbside spaces. Level 2 charging may not provide a functional charge when accounting for high turnover in the right-of-way. Additionally, curbside charging is an expensive EV project type (even when excluding higher costs for fast charging equipment), triggering significant need for street redesign and sometimes posing conflicts with trees, existing infrastructure, and other standards such as street grade for storm drainage. We have found that charging in the right-of-way includes many more unexpected issues and complications throughout the entire process of design and construction. Not one of the curbside projects in the City have finished on original schedule. While we think curbside charging is highly visible and supports EV awareness, any grant program should be cognizant of these challenges when identifying project criteria, timelines, funding maximums, and expectations.
- **Parking garages:** the City of Sacramento recently expanded public charging in City-owned parking garages using CALeVIP rebates, maximizing EV charging connectors on the current electrical services. Our parking garages are now limited from further expansion due to electrical service size. Similar limitations may apply to other existing parking garages. Funding should support related electrical service costs that may be necessary to increase chargers.
- **Transportation hubs:** This is an important project type. We are a proud partner supporting local e-mobility hub efforts. One major flag to consider for grant programs are operational cost issues. While grants may provide up-front funding, a big barrier to sustained e-mobility hub operation may be operational funding, especially where the hub is designed to serve multiple use types. We encourage the thoughtful design of program guidelines, and we emphasize the importance of a core, committed project operator. Guidelines can also help applicants prepare and ensure adequate resources are available for sustained operation.

Considerations for low-income residential charging. We applaud the inclusion of this project type. Innovative and collaborative programs for low-income needs are critical.

Consumer rebate for at-home installation - Block grant implementation?

- Any program should be designed with the needs of renters in mind. Rebates to renters will not overcome the split-incentive for improvements; the CEC should consider a targeted program with technical and direct install assistance to low-income and multi-family housing owners. Based on experience with EV and charger rebates in our region and the Green City, "Sac-to-Zero" infrastructure investments, we believe that providing full installation support

and funding is critical to motivate participation. Efforts have been most successful when EV chargers have been offered fully funded as part of a complete program, including design construction, and operation for a limited term. Otherwise, we expect that the program would face implementation challenges, and we would expect further disincentive for property owners to participate.

Are there target applicants besides the electric vehicle service providers (EVSPs) or residents that we should be considering?

- We think a program would have limited success without the engagement of apartment associations, affordable housing operators, and non-profit operators. We strongly encourage the CEC to design a program that accounts for the largest potential barriers to low-income installations and design accordingly, with a focus on increasing access in renter-occupied and multi-family housing.

What are the best approaches to low-income verification?

- Focusing on regulated affordable housing can simplify the verification process. The City has used the following definition for City ordinance and policy documents, relying on thresholds established in the California Health and Safety Code.

REGULATED AFFORDABLE HOUSING means a building to be occupied by low or moderate income households as defined in California Health and Safety Code Section 50093; offered at an affordable rent as defined in California Health and Safety Code Section 50053 for a period of at least 30 years; and subject to restriction for a period of at least 30 years under a recorded regulatory agreement between the property owner and a local, state, or federal agency.

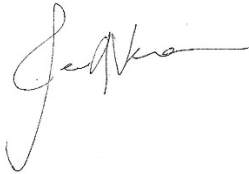
We recommend that CEC staff engage local affordable housing operators participating in EV car share or infrastructure programs, like the Sacramento Housing and Redevelopment Agency and Mutual Housing. Lessons can be learned from these existing efforts. We also recommend the Sacramento Air Quality Management District, which has managed the implementation of EV charging at multiple affordable housing sites through the CARB-funded Our Community Car Share Program (<https://www.airquality.org/Our-Community-CarShare/Apply-for-Our-CarShare>).

Second block grant concept. We agree with the goal of quick and efficient funding distribution. Within this funding concept, we wish to highlight the importance of staff capacity for implementation and deployment at local agencies. Staff time should be supported by the local grants. Supporting capacity of local community-based organizations and non-profits is also critical. Without supporting this additional capacity, many communities will not be able to successfully utilize funding. Our region would also benefit from a portion of block grant funding supporting regional capacity for broader implementation, including the capacity to design projects, engage stakeholders, and manage implementation. Unlike other regions, Sacramento region does not have a regional energy network authorized by the CPUC, or other regional implementing body that can fill this role across multiple jurisdictions.

Signage project. We think that the signage concept is an important pilot to advance. We encourage an emphasis on brand-neutral local street signage that complies with the California Manual on Uniform Traffic Control Devices, which will be critical to ensure universality and to minimize confusion to drivers of internal combustion engines. The projects could take a geographic focus, but should ensure consistent signage for all chargers of a certain standard (e.g., provide signage for all fast chargers in a two-mile radius). We also encourage the CEC to keep grant eligibility broad, and include universities, non-profits, and others. While this is an important issue, managing a signage project is likely beyond the immediate EV priorities and capacity at our agency, and we expect other agencies may feel the same. We encourage the CEC to design this program broadly, but to ensure consistency in messaging and signage across a geographic area. Any funded projects should include evaluation of changes in EV awareness and perception. The program should include a requirement for coordination with the local permitting agency, in addition to Caltrans.

Thank you in advance for consideration of our comments. We appreciate the Energy Commission's leadership in vehicle electrification, and for the collaborative approach to programming. We look forward to continued collaboration as we work to achieve equitable zero-emission mobility for all. We are available for any questions or to further discuss our comments.

Best regards,



Jennifer Venema
Climate Action Lead
City of Sacramento
jvenema@cityofsacramento.org
916-808-1859