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GRID Alternatives Comments to the CEC 2022 Electric Vehicle Infrastructure Project Funding

Attached please find GRID Alternatives' comments regarding the December 2nd Light-Duty Electric Vehicle Infrastructure Allocation Workshop on Funding Ideas for Light-Duty Electric Vehicle Charger Infrastructure Projects. Thank you for your consideration!

Additional submitted attachment is included below.



December 21, 2021

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

VIA DOCKET

Energy Commission Docket 20-TRAN-04

Re: 20-TRAN-04 Electric Vehicle Infrastructure Project Funding

Dear Commissioners:

GRID Alternatives (GRID) submits the following comments regarding the December 2nd Light-Duty Electric Vehicle Infrastructure Allocation Workshop on Funding Ideas for Light-Duty Electric Vehicle Charger Infrastructure Projects. In particular, GRID wants to express our strong support for the proposed investments in Low-Income Residential Charging, and provide answers to the questions below that staff has requested feedback on for that proposed program, on page 39 of the Workshop presentation.

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

GRID recommends that the Commission stay focused on low-income households as the core target applicants for this program, at least at the beginning when the low-income residential charging program is getting up and running. GRID's analysis of US Census Data indicates that there are approximately 2 million low-income homeowners in California alone, an enormous market.¹ California has a long history of successful climate programs that focus exclusively on low-income families, such as the Disadvantaged Communities Single-family Affordable Solar Homes (DAC-SASH) program that GRID administers for the CPUC and the state's investor-owned utilities. These programs are deeply impactful, driving large-scale, measurable economic and environmental benefits for Californians who need them the most, in part because they focus on a single group of applicants/beneficiaries, allowing the agency and program administrators to develop customized strategies for successfully serving a population that has many barriers to participation in clean energy programs, across a state as large and diverse as California.

¹ GRID Alternatives presentation to EV Infrastructure Strike Force Equity Workgroup, 11/6/20:
<https://docs.google.com/presentation/d/1HxgG72EP7YjM3LO3eoYQYXxEAQHqmK2SnhOoVKHnvs/>

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

In the low-income EVSE programming that GRID implements for some of CARB's EV equity programs, we have had success providing a new offering: subsidized access to public charging for low-income drivers who are unable to install a dedicated home charger due to their housing situation. Currently this offering is being deployed in partnership with EVgo, and offered to customers of CARB's EV equity financing programs: the Clean Vehicle Assistance Program administered by Beneficial State Foundation, and the Driving Clean Assistance Program administered by Community Housing Development Corporation.

Our long-term vision for this offering is to offer low-income EV drivers the equivalent of the Electronic Benefit Transfer (EBT) cards used for the Supplemental Nutrition Assistance Program (often referred to as "food stamps"), but for EV fuel instead of groceries. Given that California's investor-owned utilities have provided subsidized electricity to low-income ratepayers for many decades, the underlying idea here is simply to develop an offering that allows low-income EV drivers to access similar subsidies at a different point of sale when they can't charge at home on their discounted utility rates. We are seeing increasing interest across the state in taking this approach to scale, including at the California Public Utilities Commission, but it requires significant inter-agency collaboration to make it into a reality, and the CEC can play a critical role. And if the Commission can help bring this concept to scale, it will have the extra benefit of helping increase utilization rates for the state's extensive light-duty public charging infrastructure investments in disadvantaged and low-income communities.

What are the best approaches to low-income verification?

GRID is grateful that the Commission is asking this critical question. Income verification can provide both significant challenges for program administrators, and significant barriers to participation for potential participants, many of whom may be hesitant to share sensitive private financial information simply to access a home charger. The good news is that GRID has partnered with CARB over the last three years to develop and launch Access Clean California, a statewide outreach and application program for the state's EV and other climate equity programs that also offers centralized income verification. The Commission can collaborate with CARB on this effort to streamline income verification for this new program, which will be particularly strategic for a low-income residential charging program that would pair naturally with CARB's EV equity programs, since installing a home charger is typically a component of a larger EV purchase transaction anyhow.

By collaborating with CARB and Access Clean California, the Commission can tap into "categorical eligibility" opportunities for income verification when participants have already gone through income verification through one of CARB's income-qualified EV incentive programs, or other income-qualified programs, and can tap into Access Clean California's centralized income verification offering for the remaining participants. The result will be a simpler, more efficient experience for both the consumer and for the Commission authorized programs, while reducing the number of times low-income households have to go through the difficult, often invasive process of proving that they are eligible. This approach

comes directly from the recommendations in the CEC's SB 350 Barriers Study², as well as CARB's SB 350 Barriers Report.³

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

The virtue of focusing on providing direct benefits to individual low-income households is that the Commission can avoid the "green gentrification" concerns inherent in installing shared or public chargers in historically low-income neighborhoods, which may then inadvertently help attract higher income households to move in as they search for affordable housing. By focusing on **people** instead of **places**, and providing benefits directly to individual low-income households, the Commission can ensure that 100% of the benefits of this program go to the Californians who need them the most. If paired with intentional, coordinated outreach with CARB's EV equity programs, the Commission can work directly with these households to provide comprehensive solutions to help low-income families transition into EVs, a critical step towards meeting the state's ambitious goals for transitioning to 100% zero emission vehicles in all of our communities..

Thank you for the opportunity to provide input on this exciting and much-needed equity program. We look forward to collaborating with the Commission to ensure that low-income Californians have robust and equitable access to electric vehicle charging infrastructure.

Sincerely,



Zach Franklin
Chief Strategy Officer
GRID Alternatives

² <https://www.energy.ca.gov/rules-and-regulations/energy-suppliers-reporting/clean-energy-and-pollution-reduction-act-sb-350/sb>

³ <https://ww2.arb.ca.gov/resources/documents/carb-barriers-report-final-guidance-document>