DOCKETED	
Docket Number:	20-TRAN-04
Project Title:	Electric Vehicle Infrastructure Project Funding
TN #:	241057
Document Title:	EVgo Comments on Light-Duty Electric Vehicle Infrastructure Workshop
Description:	N/A
Filer:	System
Organization:	EVgo / Adam Mohabbat
Submitter Role:	Public
Submission Date:	12/21/2021 4:41:41 PM
Docketed Date:	12/21/2021

Comment Received From: EVgo / Adam Mohabbat
Submitted On: 12/21/2021
Docket Number: 20-TRAN-04

EVgo Comments on Light-Duty Electric Vehicle Infrastructure Workshop

Additional submitted attachment is included below.

December 21, 2021

Ms. Patricia Monahan
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

RE: EVgo Comments Light-Duty Electric Vehicle Infrastructure Allocation Workshop

Dear Commissioner Monahan and Staff:

EVgo commends the California Energy Commission (CEC) for its continued leadership in supporting California's climate and zero emission goals through thoughtful, sustained investment and programs, including its Clean Transportation Program (CTP) leadership in helping the state meet its climate and zero emission vehicle (ZEV) goals through sustained and equitable investments in EV charging infrastructure.

With more than 800 fast charging locations and 1,000 Level 2 chargers, EVgo's owned and operated charging network serves over 68 metropolitan areas across 35 states and more than 310,000 customer accounts. Headquartered in Los Angeles, EVgo's fast charging network includes over 330 fast charging locations in California. EVgo is powered by 100% renewable energy.

EVgo thanks the CEC for conducting a public workshop to outline charging infrastructure concepts and solicit feedback for the CTP's light duty infrastructure program for the 2021-2022 fiscal year. With the addition of the state's passage of the ZEV package in the 2021 state budget, the CTP remains the state's strongest tool to accelerate EV charging infrastructure deployment and meet the state's goals for 100% ZEV sales beginning in 2035, and 1.5 million charge ports by 2030.[1] [2]

Please find EVgo's comments on light duty infrastructure programs below as staff continues planning for investments. EVgo looks forward to being a partner to the CEC in pursuit of a fully electrified transportation sector and welcomes itself as a resource should any questions arise.

Best,

Adam Mohabbat
Manager, Market Development
adam.mohabbat@evgo.com

[1] *Executive Order N-79-20,* https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf
[2] *Assembly Bill 2127 Electric Vehicle Charging Infrastructure Assessment - Analyzing Charging Needs to Support Zero-Emission Vehicles in 2030 (Commission Report),* California Energy Commission, July 2021.

Block Grants for Light-Duty EV Charging Infrastructure

1. **Given the year lag between CALeVIP 1.0 and its successor programs and the unprecedented funding allocated to the agency, the CEC should focus on funding waitlisted sites in past CALeVIP solicitations until successor programs are launched in late 2022.**

During the public workshop, CEC staff stated program participants should expect the block grant successor programs to launch in late 2022. Meanwhile, the last CALeVIP DCFC solicitation opened in Q4 2021. This will mean a full year's gap between CALeVIP 1.0 and the new successor programs. EVgo recommends that the launch date for the new successor program be moved to earlier in 2022, and if this cannot be done, EVgo recommends that CEC begin to fund waitlisted applications across its earlier CALeVIP solicitations.

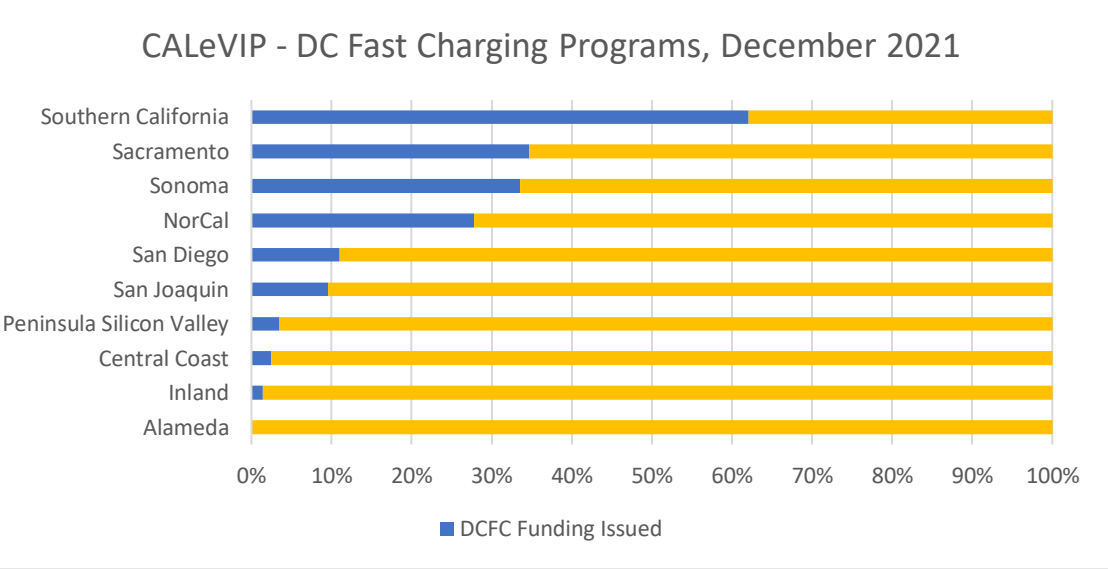

Figure 1. DC Fast Charging Funding issued from CALeVIP Programs. Source: CALeVIP.com, Dec. 2021

As shown above, across all CALeVIP programs that include funding for DC fast charging, all but one program has issued no more than 40% of its funds to date, with the Southern California program (launched in 2018) as the exception with approximately 60% of funds issued. This shows that there has been high attrition in the CALeVIP program and speculative applications are clogging the queue, as this Southern California project launched in 2018, three years ago, had a 12-month energization window for sites. Meanwhile, many shovel ready projects have been waiting in the CALeVIP queue for many months or years. Given that many applications have been waiting for the queue churn to move forward, deploying funding to waitlisted sites on an interim basis while a longer successor program can be implemented would be a wise use of funds. This is the quickest way for the CEC to begin to put its extra funding allocation to work.

2. **EVgo recommends the CEC iterate on lessons learned from the first block grant in order to fulfill its goal of quickly & efficiently fund and deploy EV charging station installations.**

While the CALeVIP program has gone through significant improvement through the years, the program still suffers from program design issues and a long list of speculative applications leading to clogged

queues and an extended waitlist. As CEC staff contemplates design and improvements for the upcoming programs, EVgo extends the following design recommendations**:**

A. **Adopt the "fast track" and "jump start" lanes for applicants in order to prevent long site application queues and waitlists:** Since the inception of the CALeVIP program, due to low barriers to entry which encouraged speculative applications, the CEC has never fully issued all funds for a given solicitation. EVgo has experienced delays in processing applications up to 16 months in CALeVIP due to oversubscription, versus 2-3 months for most competitive solicitations across the country. For example, the CEC's Southern California Incentive Program, as discussed above, has a 12-month energization requirement and has only issued $18 million of the program total despite being launched three years ago.[3]

   EVgo would recommend that future block grants include a larger pot of funding allocated towards fast track applicants – similar to the CEC's EnergIIZE program – who have proven installation experience and viable, project-ready sites.[4] Additionally, the CEC should increase its transparency by requiring program administrators to report on application processing timelines and attrition on a quarterly basis.

B. **Screen for execution ability:** There are several ways to screen for an appllicant's ability to execute on a project, expediting deployment and preventing long waitlist queues with speculative applicants unlikely to come to fruition**.** One method of verifying a higher level of eligibility is for applications to have a higher degree of utility readiness. This is common practice in other programs across the country and should be incorporated in CALeVIP. In Colorado Energy Office's Charge Ahead Programs, for example, applicants are required to share whether that have contacted their "utility to discuss the implications of installing a DCFC charging station" and to "provide documentation demonstrating the discussion that took place around your utility rates and costs."[5] Another example is Washington's Department of Ecology's Appendix D program, which requires applicants to provide a letter of support from the utility describing any impacts the proposed project may have on the local grid, and site readiness for future expansion beyond this project.[6]

C. **Remove the per site cap on number of chargers:** Currently, CALeVIP has a maximum of 4 to 6 chargers per site applications. As vehicle adoption increases, especially amongst those without access to home charging, sites will need more than 4 to 6 chargers in order to adequately serve drivers. From both an availability and reliability standpoint, redundancy is a positive. Thus, EVgo would recommend increasing, or eliminating altogether, the max caps for single site eligibility. There is precedent for this, including in

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[3] *Southern California CALeVIP Project*, CEC, https://calevip.org/incentive-project/southern-california

[4] *Energy Infrastructure Incentives for Zero-Emission Commercial Vehicles (EnergIIZE Commercial Vehicles), https://www.energy.ca.gov/proceedings/energy-commission-proceedings/energy-infrastructure-incentives-zero-emission-commercial*

[5] *Charge Ahead! Program Guidance,* pg. 6, Colorado Energy Office, https://cleanairfleets.org/programs/charge-ahead-colorado

[6] *Grants Announcement of Funds Available and Grant Guidelines to Purchase and Install Electric Vehicle Charging Infrastructure along High Traffic Transportation Corridors in Washington,* pg. 19, Washington Department of Ecology, https://apps.ecology.wa.gov/publications/documents/1902033.pdf

the CEC's recent CARTS and REACH solicitations, which do not have a site level cap, as well as Bay Area Air Quality Management District's BAAQMD *Charge!* Program, which do not have per site charger eligibility caps. [7] [8] [9]

D. **Eliminate the single TIN-applicant cap:** In the upcoming Southern California Level 2 CALeVIP solicitation, staff has proposed to remove the long-standing TIN cap to the program's design.[10] EVgo commends this move and recommends the same be done in the DCFC space, where there has been a seemingly high demand of applications, but high attrition and challenges in terms of getting funding out the door.

   There are a multitude of business models within the EV charging industry, and while each model engages with the site host in the deployment, the customer on record can look different for each model. The TIN cap has unintentionally limited the participation of owner-operators, but not manufacturers or networks who routinely apply and execute on behalf of hosts, but do not take the financial risk. This proposed change allows more participation for more business models and further promotes competition within the burgeoning charging industry.

E. **Allow program applicants to build at risk:** Build at risk treatment, which allows applicants to begin development at their own risk once the application window opens, is increasingly common in DCFC programs, which have longer development timelines given complex work needed with utility and local permitting agencies. To expedite charging station investments, a program best practice is to allow EVSPs to begin project development or "build at risk" as soon as the program window is open. CALeVIP currently allows for this, and EVgo recommends this as practice to continue in the second block grants.[11]

   Programs that prohibit or disallow reimbursement for work undertaken prior to final contract signature can delay project development *up to 12 months.* The CEC should ensure that charging network providers, especially those in the "fast track" applicant lane, are allowed to build at their own financial risk between the time the program starts accepting applications to when the grant is awarded. If an application receives an award, those expenses should be reimbursable. Continuing this practice from CALeVIP

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[7] *Charging Access for Reliable On-Demand Transportation Services (CARTS),* CEC, https://www.energy.ca.gov/solicitations/2021-08/gfo-21-601-charging-access-reliable-demand-transportation-services-carts

[8] *Reliable, Equitable, and Accessible Charging for multi-family Housing (REACH*), CEC, https://www.energy.ca.gov/solicitations/2021-11/gfo-21-603-reliable-equitable-and-accessible-charging-multi-family-housing

[9] *Charge! Program,* Bay Area Air Quality Management District (BAAQMD), https://www.baaqmd.gov/funding-and-incentives/businesses-and-fleets/charge

[10] *Southern California Level 2 Incentive Project Public Workshop*, CEC, https://www.energy.ca.gov/event/workshop/2021-09/southern-california-level-2-incentive-project-public-workshop

[11] All costs may be incurred when program is announced but are incurred at your own risk prior to the date your funds are reserved (e.g., application may be determined ineligible, or funds may be unavailable at time of application). For more information, see: https://calevip.org/

1.0 to the successor programs will help get chargers in the ground faster, thereby getting California closer to its state goals.

F. **Reflect vehicle battery advancements with higher power charging equipment:** While 50kW has traditionally been the minimum for DC fast charging program, the market is seeing power-sharing configurations become more common and battery technology continuing to evolve, allowing for higher power charging. Charging programs should adapt to this market change and reward higher power charging in light duty programs. EVgo recommends a new 100kW charging speed minimum. 100kW chargers are more cost efficient than 150kW as well as more accommodating of both CCS and CHAdeMO connector types, the latter of which does not currently have a 150kW standard at this time.

   If the CEC wants to incentivize higher power charging, instead of requiring it, it can do so by awarding further points on applications to higher power charging proposals instead of requiring it as the standard. An example of this can be seen in Maryland's Appendix D program, where 50kW was the equipment standard, and additional points were awarded to applications with higher power levels.[12]

G. **Provide program funding predictability:** EVgo recommends the CEC to provide clarity and predictability of the programs and launch timeframes. By doing so for the block grants, market participants can better align their siting and application efforts, ultimately leading to more shovel-ready projects and reduced attrition, further reducing deployment delays.

   Further, it provides businesses with more certainty that they can pan around. Similar to the CEC, Colorado Energy Office administers multiple charging infrastructure programs per year. Their flagship program, Charge Ahead Colorado, typically has three application rounds per year in January, May and October, providing industry with certainty and predictability in schedule. [13] Similarly, its Plazas program, which is very similar to the CARTS and REACH programs, has gone through multiple funding rounds.[14] EVgo recommends that that CEC emulate this best practice from Colorado with a predictable annual schedule, and that CEC repeat and build upon some of its new solicitations such as REACH and CARTS, rather than make them "one and done."

DC Fast Charger Corridors

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[12] *Guidelines for Maryland Electric Corridors Grant Program*, Maryland Energy Administration & Maryland Department of the Environment, https://mde.maryland.gov/programs/Air/MobileSources/SiteAssets/Pages/MarylandVolkswagenMitigationPlan/Electric%20Corridors%20Grant%20Program%20Framework.pdf

[13] *Charge Ahead Colorado*, Colorado Energy Office, https://energyoffice.colorado.gov/zero-emission-vehicles/charge-ahead-colorado Pennsylvania and the Maryland Energy Administration have taken a similar approach with multiple, predictable funding rounds. For more information on funding best practices, see: https://site-assets.evgo.com/f/78437/x/2a8b3fcecb/connect-the-watts_public-funding-best-practices.pdf

[14] *EV Fast-Charging Plazas,* Colorado Energy Office*, https://energyoffice.colorado.gov/zero-emissions-vehicles/ev-fast-charging-plazas#:~:text=The%20Colorado%20Energy%20Office's%20(CEO,large%*

3. **<u>Instead of dedicated corridor programs, the CEC's Clean Transportation Program investments should complement federal infrastructure programs by focusing on community charging through existing CEC programs.</u>**

In the recently passed Bipartisan Infrastructure Law from the federal government, $7.5 billion dollars will be spent on EVSE, with $5 billion going to the state DOTs for implementation. As such, California's Caltrans stands to receive a formulaic allocation of $383 million primarily dedicated to deploying corridor charging infrastructure along the corridors over a 5-year period. Given this funding already being directed largely to corridor charging, EVgo does not recommend CEC use CTP funding to serve corridors.

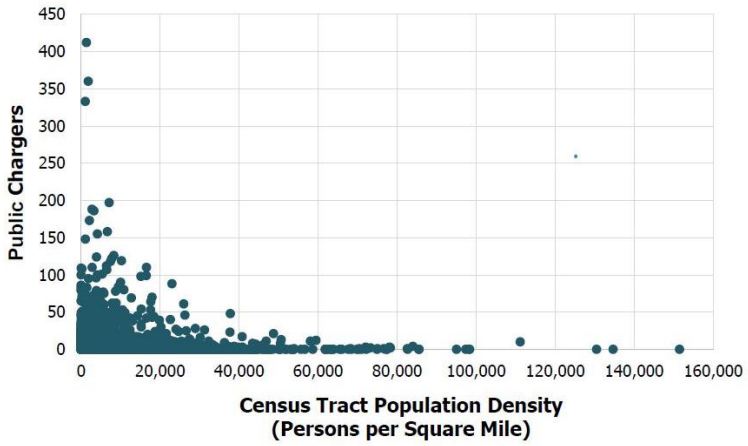

Figure 2: Public L2 and DCFC by Census Tract Population Density. Source: CEC SB 1000 Report

EVgo recommends that the CEC should focus its investments where funding and deployment is still lagging and where federal funding is not envisioned, including the shortage of public charging in high density areas as opposed to low density areas, as noted in the December 2020 SB 1000 report and shown in Figure 2 above.[15] EVgo commends the CEC for its innovative work in establishing the CARTS and REACH programs to advance EV applications for rideshare and multifamily housing and recommends that the CEC build upon these programs with subsequent rounds of funding.

<u>Conclusion</u>

EVgo thanks the CEC for its consideration of its recommendations as it plans the next phase of light duty infrastructure programs. EVgo looks forward to continuing its partnership in bringing a fully electrified transportation system and respective benefits to California.

[15] *California Electric Vehicle Infrastructure Deployment Assessment: Senate Bill 1000 Report*, CEC, https://efiling.energy.ca.gov/getdocument.aspx?tn=236189