

<b>DOCKETED</b>	
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Submitted On: 2/4/2022  
Docket Number: 21-TRAN-03*

## **EVCA CEC Zip Response**

*Additional submitted attachment is included below.*



# Electric Vehicle Charging Association

INNOVATION FOR CLEAN MOBILITY

February 4, 2022

Hannon Rasool  
Deputy Director, Fuels and Transportation Division  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

**RE: Docket No. 21-TRAN-03 Electric Vehicle Charging Association (EVCA)  
Comments on the Zero Emission Vehicle Infrastructure Plan (ZIP)**

Dear Mr. Rasool,

EVCA commends Governor Newsom and the California Energy Commission (CEC) for their commitment to build world-class ZEV infrastructure to support California's climate and ZEV adoption goals.

EVCA is a 14-member not-for-profit organization comprised of leaders throughout the value chain of the electric vehicle (EV) charging industry to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the expeditious and efficient adoption of EVs and deployment of EV charging infrastructure.

EVCA supports the initial draft outline for ZIP, particularly the focus on equity, medium- and heavy duty programs, and emerging technologies.

EVCA encourages the ZIP to describe in detail how efforts to deploy infrastructure and develop policies will be coordinated between the California Air Resources Board, California State Transportation Agency, the California Department of Transportation, and the Governor's Office of Business and Economic Development. Given the Legislature's appropriation of \$785 million for ZEV infrastructure last year, the proposed \$900 million for this year, and the impending \$384 million in federal investments for charging in the state, it's essential to ensure these various sources of funding complement each other. Interagency coordination, with clearly defined lead agencies and supporting agencies, as well as clear delineations on how each of these sources of funding will be used, is essential to ensuring the ZIP is effective.

EV drivers' and fleet owners' charging needs are diverse, leading to a breadth of business models, products, and services to fill gaps in the market. This market continues to evolve rapidly with new and emerging technologies; this trend will likely continue as this industry matures.

Furthermore, deploying the right charging solution is highly site-specific, and, in part, dependent on the resources and technical capacity of the entity that purchases or leases the charging station (the site host). Additionally, non-traditional business models and use cases for charging infrastructure are emerging - such as shared co-located public/private fleet charging - that present valuable innovations for project viability and increased access to clean miles, but remain unaccounted for in existing program eligibility design. Therefore, we respectfully encourage the CEC to develop future incentive programs that are inclusive to company business models, technology solutions, and charger ownership structures, so that programs and project designs can optimally benefit communities with respective charging uses cases and build a diverse, competitive market.

It's critical that the ZIP address ZEV charging infrastructure for urban, suburban, and rural communities. While the challenges vary, EVCA recommends the ZIP specifically address these public charging opportunities, so California's ZEV goals are met by reaching these communities. The ZIP should also address payment methods that allow charging companies to implement payment technologies that reflect the evolving nature of the market and optimize the consumer experience while minimizing station downtime and costs.

EVCA remains committed to working with the CEC to develop and implement the ZIP.

Thank you for your consideration,

Dylan Jaff  
Government Affairs  
Electric Vehicle Charging Association