

DOCKETED

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**EVgo Comments on CEC's Zero Emission Vehicle
Infrastructure Plan (ZIP) Workshop**

Additional submitted attachment is included below.

February 4, 2022

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

RE: EVgo Comments on CEC's Zero Emission Vehicle Infrastructure Plan (ZIP) Workshop

Dear Commissioner Monahan and Staff:

EVgo commends the California Energy Commission (CEC) for continued leadership in supporting California's climate and zero emission vehicle (ZEV) goals through sustained investment in infrastructure and thoughtful planning and programs.

With more than 800 fast charging locations, 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 and 820 fast charging stalls in California. EVgo is powered by 100% renewable energy.

EVgo appreciates the recently held Zero Emission Vehicle Infrastructure Plan (ZIP) workshop held in January and the CEC's dedication to serving as an organizing agency for ZEV infrastructure in California. EVgo supports the initial draft outline presented during the workshop, and notes that this document is timely. The increased infrastructure funding in California will require strong coordination between implementing agencies in order to expeditiously roll out programs and state's goals for 100% ZEV sales beginning in 2035, and 1.5 million charge ports by 2030.^{1 2} EVgo encourages the CEC to continue playing this coordinating role through development of the ZIP.

As staff continues with the ZIP's development, EVgo offers the following select comments:

1. **The CEC should use the ZIP as an active mechanism for cross agency collaboration to coordinate infrastructure deployment.**

The need for the CEC to play a central role in the ensuring complimentary planning for infrastructure programs is paramount. Last year, the California state legislature appropriated \$500 million for ZEV infrastructure; this will be augmented by a proposed estimated \$2 billion for light, medium, and heavy-duty infrastructure this year and the forthcoming ~\$380 million from the Infrastructure Investment and Jobs Act (IIJA) to be administered by state departments of transportation, ideally in partnership with energy offices like the CEC.

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.

As mentioned in the workshop, the ZIP is currently slated to serve as a support document for agency actions across the state. While the need for an encyclopedia-like guide is a helpful first step, the CEC should further elaborate the differences between the ZIP and existing planning efforts, such as the Zero Emission Vehicle Market Development Strategy, the Transportation Electrification Framework, Clean Transportation Program, as well as AB 2127 and SB 1000.^{3 4 5 6 7}

Though the CEC does have explicit authority to direct agency actions beyond the CEC, EVgo would encourage the ZIP expand on the listed existing planning efforts with explicit policies and actions that can help to streamline funding programs and alleviate barriers to deployment, including ways to streamline permitting, utility development timelines and issues such as easements, as well as more efficient deployment of funding by state programs.⁸

2. The CEC should augment the ZIP with joint agency workshops to solicit industry feedback on infrastructure needs, funding programs, and remaining deployment barriers,

EVgo would encourage the CEC to use the ZIP as a conduit to bring relevant agencies, including the Air Resources Board (CARB), Governor's Office of Business and Economic Development (GO-Biz), CalSTA, Caltrans, and the Public Utilities Commission (CPUC), together to synchronize their program efforts through joint agency workshops for relevant issues, including best practices in program design and challenges to the timely deployment of EV charging.

Last year, the CEC held a joint agency workshop in October on Accelerating Electric Vehicle Charging Infrastructure Deployment and Grid Integration. This served as a great forum for agency staff and industry to exchange challenges and solutions to charging station deployment. EVgo recommends that those topics be included in the ZIP, would further encourage the ZIP to include joint agency workshops on:

- **Permitting:** EVgo appreciates the leadership from GO-Biz on permitting and recognizes that even with legislation, including AB 1236 and the more recent AB 970 which has come into effect beginning last month, permitting still poses a challenge on the ground and serves as barrier to deployment. EVgo recommends a workshop on updates from AB 970 implementation, remaining challenges, and best practices amongst municipalities and industry.⁹
- **Best Practices - Light Duty Infrastructure Funding Program Design & Coordination Among State Programs:** As stated above, the state is poised to implement a historic amount of investment for EV infrastructure in the next two years. As such, it would behoove the relevant implementation

³ *California Zero-Emission Vehicle Market Development Strategy*, Governor's Office of Business and Economic Development, <https://business.ca.gov/industries/zero-emission-vehicles/zev-strategy/>

⁴ *Transportation Electrification Framework*, California Public Utilities Commission, <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M326/K281/326281940.PDF>

⁵ *Clean Transportation Program*, CEC, <https://www.energy.ca.gov/programs-and-topics/programs/clean-transportation-program>

⁶ *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.

⁷ *California Electric Vehicle Infrastructure Deployment Assessment: Senate Bill 1000 Report*, CEC, <https://efiling.energy.ca.gov/getdocument.aspx?tn=236189>

⁸ *Connect The Watts With The EVgo Charging Station Ecosystem*, EVgo, <https://www.evgo.com/connect-the-watts/>

⁹ *Connect the Watts: Local Permitting Best Practices*, EVgo, <https://site-assets.evgo.com/f/78437/x/a36897f7b3/connect-the-watts-local-permitting-best-practices.pdf>

agencies and industry to share best practices in program design from both in and out of California with the intent of implementing those best practices in forthcoming programs. This becomes doubly relevant with the forthcoming infrastructure bill funding. The CEC should utilize the ZIP as a guiding document for interagency collaboration between the CEC and CalSTA in order to expedite funding distribution, looking to other best practice states such as Colorado for a successful blueprint in collaboration between respective state departments of transportation and energy.¹⁰

- **Best Practices - Fleet and Medium- and Heavy-Duty (MHD) Infrastructure Programs & Coordination Among State Programs:** California has ambitious goals of 100% of ZEV truck sales and 100% of MHD truck and bus operations to be ZEV by 2035 and 2045 respectively, which are being further developed at CARB through the Advanced Clean Truck and Advanced Clean Fleet rulemakings. As these standards are vehicle side regulations, there is a strong need to directly plan for and fund infrastructure to facilitate the deployment of electrified fleets.

The CEC's Clean Transportation Program (CTP) includes the EnergiIZE program, the state's first block grant for MHD infrastructure, which is a pivotal step in the right direction; however, there are other state programs that include infrastructure funding, including utility-administered programs with significant funding still available.¹¹ EVgo would respectfully suggest the CEC include available infrastructure funding and how to access it in the ZIP, along with a dedicated joint agency workshop for fleets and infrastructure providers on barriers to program access.

- **Grid Interconnect and Development Timelines:** Connecting EV chargers to the grid requires coordination with the local utility throughout the site design and installation process. There are many steps along the way, starting with work requests to assess power, through collaborative design iterations, and culminating with scheduling of the utility-side construction and interconnection. Project timelines can be negatively impacted by long response times to requests, utility engineering cycle times, lead time for utility equipment (e.g. transformers), a lengthy scheduling process for utility construction, outage timing, inclement weather, and interruptions to the utility workflow due to things like storm response obligations.

While the CPUC is the lead agency regulating investor owned utilities, the CEC ZIP can still play a role understanding the link between utility development timelines and timely deployment of charging infrastructure funded by the CEC, as well as illuminate best practices to streamline deployments.¹² Moreover, the CEC plays a strong leadership role with publicly owned utilities. In addition to the ZIP illuminating best practices EVgo recommends continued joint agency workshops focused on best practices and solutions.

¹⁰ In Colorado, the state DOT sub-granted federal DOT funds from the Congestion Mitigation and Air Quality Program to administer EVSE in their DCFC Plazas and corridors programs jointly with the Colorado Energy Office. See: [ev dcfc plazas grant program rfa final.pdf \(colorado.gov\)](#) and [Alternative Fuels Data Center: Colorado Energy Office: EV Fast Charging Corridors Grant Program](#)

¹¹ *Approved TE Programs*, California Public Utilities Commission, <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/transportation-electrification/approved-te-investments>

¹² *Connect the Watts: Utility Best Practices*, EVgo https://site-assets.evgo.com/f/78437/x/597fa39fa0/connect-the-watts_utility-best-practices.pdf

Conclusion

EVgo thanks the CEC for its consideration of its comments as it develops the ZIP to be beneficial for moving California closer to its clean transportation goals. EVgo looks forward to continuing its partnership in bringing a fully electrified transportation system and respective benefits to California.

Best,

A handwritten signature in black ink, appearing to read "Adam Mohabbat", with a stylized flourish at the end.

Adam Mohabbat
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