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**Electrify America comments on AB 2127 Analysis**

*Additional submitted attachment is included below.*



March 25, 2022

Hannon Rasool  
California Energy Commission, Docket Unit, MS-4  
Docket No. 19-AB-2127  
715 P Street  
Sacramento, California 95814

**RE: Implementation of AB 2127 Electric Vehicle Charging Infrastructure Assessments**

Dear Mr. Rasool:

Electrify America appreciates the opportunity to comment on the March 16, 2022, Electric Vehicle Infrastructure Projections (EVI-Pro) Workshop. CEC's infrastructure analysis pursuant to AB 2127 is an important element of the State's broader efforts to support transportation electrification and will shape billions of dollars in public and private investment to deploy electric vehicle (EV) charging infrastructure in the State over the next several years.

It is critically important to develop a fair and complete analysis that does not presuppose solutions or close the door to innovative market technologies. The previous AB 2127 analysis, for example, did not distinguish between different levels of fast charging (e.g., 50 kW and 350 kW) or account for costs associated with different scenarios, when it concluded that the state needed about 1.2 million chargers – mostly Level 2 – to support up to 8 million EVs by 2030.<sup>i</sup> Counter to the findings in the original AB 2127 report, Electrify America believes that ultra-fast charging is the most cost-effective, customer friendly, and durable solution for the EV market in California. This perspective has been shaped by our own experience as well as third party research.

For example, research by Atlas Public Policy has found that installing 350 kW DC fast charging is the most cost-effective option for meeting needs to transition the U.S. light duty fleet to 100% ZEV sales by 2035. Emphasis on 350 kW technology provides significant cost savings relative to lower levels, such as 150 kW charging, due to increased throughput and the ability of stations to serve more vehicles. Atlas found that a 350 kW charging strategy would result in \$39 billion of needed investment nationwide in public charging stations by 2030, whereas installing 150 kW would require and additional \$13 billion in additional public investment, or a 33% increase in cost.<sup>ii</sup>

While the Atlas research included investment in Level 2 charging, it comprised a significantly smaller share of stations than contemplated in California's investment. Atlas found that \$38.1 billion (97.5%) of the total investment was needed for public fast charging, to build approximately 252,000 ultra-fast 350 kW chargers, while \$967 million (2.5%) would be needed for approximately 244,000 Level 2 public and workplace chargers. Electrify America agrees that public charging needs are met most conveniently and cost-effectively through a strategy that prioritizes ultra-fast 350 kW DC fast charging.



Other compelling evidence demonstrates that investment in ultra-fast chargers is an important equity tool. According to research from UCLA,<sup>iii</sup> multiunit dwelling (MUD) residents rely on fast chargers as their primary source of charging, using public fast chargers for 43% of charging, more than twice as often as home charging and nearly three times as often as public Level 2. Harvard<sup>iv</sup> and Bloomberg<sup>v</sup> research demonstrates that those who live in MUDs and rent are lower income and more racially and ethnically diverse than the average population as a whole. Serving MUD residents and those without charging at home via public ultra-fast charging is a cost-effective way to serve far more residents than Level 2 charging.

In light of this research, we encourage the CEC to directly model a wide array of fast charging technologies, including ultra-fast 350 kW charging, in its next phase of AB 2127 analysis. We also encourage an accounting of costs, in an effort to identify the lowest cost infrastructure solutions to meet the State's goals. We have no doubt that such an analysis would lead to findings similar to those from Atlas Public Policy and reveal ultra-fast charging to be a critical element to most cost-effectively advancing the State's EV goals.

Finally, as we and others in the charging industry have shared previously, we urge you to focus on the intent of AB 2127 to help inform the state about how many chargers are needed to support its goals, not to dictate specifically where chargers should be deployed, nor to gain sensitive company-specific information about the dynamic ways users interact with particular chargers and networks. We are concerned that expanded data collection could have negative consequences for the industry, including compromising privacy and market competitive intelligence, overlapping with data collection efforts by other state agencies, and increasing soft costs associated with EV charger deployment. We encourage CEC to avoid any unnecessary or duplicative data collection that reaches beyond the scope of AB 2127, especially for chargers not funded by CEC programs.

Thank you for the opportunity to comment on this workshop and CEC's ongoing work to accelerate the transition to electric vehicles in California. If you have any questions, please do not hesitate to reach out to me or Ryan McCarthy with the Weideman Group ([ryan@weidemangroup.com](mailto:ryan@weidemangroup.com)).

Sincerely,

Matthew Nelson  
Director of Government Affairs  
Electrify America

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<sup>i</sup> <https://www.energy.ca.gov/programs-and-topics/programs/electric-vehicle-charging-infrastructure-assessment-ab-2127>

<sup>ii</sup> <https://atlaspolicy.com/how-much-should-the-u-s-invest-in-public-ev-charging-39-billion/>

<sup>iii</sup> <https://innovation.luskin.ucla.edu/wp-content/uploads/2021/03/Evaluating-Multi-Unit-Resident-Charging-Behavior-at-Direct-Charging-Behavior-at-Direct-Current-Fast-ChargersCurrent-Fast-Chargers.pdf>

<sup>iv</sup> <https://www.jchs.harvard.edu/state-nations-housing-2018>

<sup>v</sup> <https://www.bloomberg.com/news/articles/2018-08-08/who-rents-their-home-here-s-what-the-data-says>