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## **Comment on NEVI Deployment Plan**

This document supersedes \*\*\*TN 243749\*\*\*

*Additional submitted attachment is included below.*



June 28, 2022

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California Department of Transportation  
Mark Wenzel  
California Energy Commission

*Submitted via electronic commenting system:*

<https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=22-EVI-03>

**Re: 22-EVI-03 National Electric Vehicle Infrastructure (NEVI) Deployment Plan Development, 2022-26 for CEC and Caltrans**

The California Electric Transportation Coalition (CalETC) appreciates this opportunity to support California's Deployment Plan for the National Electric Vehicle Infrastructure Program (NEVI). Large scale infrastructure deployment along critical federal corridors is essential to meeting the state's goals and support the growing market of light-, medium-, and heavy-duty ZEVs.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, autonomous electric vehicle fleet operators, and other industry leaders supporting transportation electrification.

The draft plan developed by CEC and Caltrans is comprehensive and clearly demonstrates California's readiness to efficiently and effectively invest NEVI funding that will benefit California drivers as well as federal efforts to electrify the transportation fleet nationally. The CEC and Caltrans have extensive public processes in place to help guide investment that best supports equity and ensures access to charging infrastructure along California's extensive federal corridor networks, including those corridors located in or near rural, tribal and/or disadvantaged California communities.

CalETC strongly supports utility investment and involvement in EV infrastructure networks, particularly projects large enough to support corridor access to charging for the tens of millions of electric cars and trucks expected to travel along California corridors as the EV market expands.

- Utility funding and participation in NEVI-funded projects is essential as California works to electrify all vehicle segments across the state, and increasingly electrifies homes and businesses. CalETC would like to see scoring metrics encouraging utility engagement in projects during the consideration of NEVI proposals.

- Electrification of the vehicle fleet and associated charging infrastructure can be designed to increase grid safety, resiliency, efficiency, and affordability, while also supporting electrification and resiliency efforts across all segments of the California economy. However, this will require coordination with utilities on charging infrastructure buildout. Again, CalETC would like to see scoring metrics encouraging utility engagement and support of projects during the consideration of NEVI projects.
- While we understand the federal government encourages minimizing use of NEVI formula funds for grid-side upgrades, it is essential to recognize that some grid-side funding is inevitable to meet state goals, particularly for small or mid-size utilities, in disadvantaged and rural communities, and/or in those communities most benefitting from California's grid resiliency and wildfire mitigation efforts. CalETC encourages the CEC and Caltrans to specifically recognize the potential need for grid-side investments and ensure these investments do not conflict with the NEVI goals to minimize NEVI funds being used for grid-side upgrades.

CalETC strongly supports the deployment plan recognition that reliability is an essential component for chargers in the network, those funded by NEVI and all public charging. The federal standards for 97% uptime calculation will need to be strengthened. Given the reliability efforts underway in California, CalETC recommends specifying the criteria used to evaluate uptime more thoroughly in the solicitation process and ensuring there are effective mechanisms in place to enforce reliability criteria.

CalETC encourages CEC and Caltrans to maintain some flexibility in defining corridor segments to avoid unintended consequences. We appreciate and support the intention to seek stakeholder input in the solicitation development process and believe this can help with defining the corridor segments. We also encourage you to consider mechanisms to avoid excluding strong projects – including but not limited to local government applications – due to strict interpretations of segment boundaries and requirements. CalETC supports local government applications for NEVI projects, we do not want to exclude local governments or other entities with strong project proposals from support and engagement by eliminating them from this project funding. We suggest CEC and Caltrans consider how best to avoid excluding local government or other stakeholders from being the lead applicant for a grant funding opportunity. It may be necessary to allow for more than one applicant for a chosen corridor segment or aid stakeholders, including local governments that may want to collaborate with other local governments along a particular segment. We encourage the state agencies to work with CalETC and interested parties, particularly for tribal and/or rural communities, to ensure that strong proposals addressing equity priorities are not excluded from the NEVI funding opportunities simply because they cannot meet the needs of an entire segment defined by CEC and Caltrans.

Thank you for your consideration. CalETC looks forward to working with the CEC and Caltrans on this important plan and on future charging infrastructure efforts.

Regards,



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California Electric Transportation Coalition