

DOCKETED

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National Electric Vehicle Infrastructure (NEVI) Funding Program

Attached please find several thoughts and ideas the State may want to consider as they move forward to implement the NEVI program. Please do not hesitate to call if you would like to discuss in more detail.

Additional submitted attachment is included below.



Deloitte.

Comments for
Docket 22-EVI-05

September 28, 2022

Considerations for CEC & Caltrans

We identified 5 themes the State of California may want to consider when creating a sustainable and impactful EV charging network.

Considerations for CEC & Caltrans					
Theme	Enhancing Safety	Ensuring Benefits to DACs/J40	J40 Compliance, Reporting, and Public Engagement	Pairing Local Workforce Development with J40	Establishing Alternative Utility Scenarios
Challenge	Introducing street lighting around EV charging stations is a progressive step in creating a safe environment for users; however, other factors and mitigations should also be considered when evaluating and addressing safety at each EV location.	With any new program, sometimes actions and interventions that appear to support positive outcomes end up having unintended consequences. As a new program, NEVI could unintentionally exclude factors that would otherwise enhance the quality of life for DACs, or conversely include factors with unintended consequences.	Justice40 criteria, reporting, and public communication requirements need to be met to comply with program requirements and unlock future funding for the State's NEVI Program with IIJA grants.	Without careful consideration of all aspects of the NEVI work program language, and disciplines required, some specialties may be omitted from job opportunities thus limiting access for persons residing in or representing DACs.	Since we are planning for a future that is not a simple progression of the present, current economic projections may not fully depict potential future scenarios for utilities, which could leave the CA NEVI array at risk if in the event of unexpected circumstances.
Consideration	California should evaluate expanding safety measures, such as monitoring systems and emergency service access, focusing on areas with high crime risk and low retail density.	California should consider a robust modeling system, showcasing to what degree DACs are receiving new benefits from the NEVI Program AND with the capability to run scenarios that can also identify unintended consequences.	California should consider a robust evaluation process to ensure that Justice40 criteria, and State goals and objectives, are met. Also worth considering are the public facing communication tools and procedures necessary to engage communities.	California should develop strategies that pair local workforce development with Justice40 Initiatives.	Economic projections should show the impact of the demand charge holiday in the event it is not renewed after the now-planned 5-year end date.

Approved Exceptions in State NEVI Deployment Plans

We found that 2 types of exceptions existed within the initial 35 NEVI Deployment Plans approved by the Joint Office of Energy and Transportation. Additionally, states have preemptively begun exploring future exceptions.

Chargers Every 50-Miles Requirement

Several states were awarded exceptions for not meeting the 50-mile requirement.

Rationales included:

- Insufficient demand to maintain and operate chargers,
- Grid capacities that are unable to support charging, and
- Geographic terrain limiting the viability of constructing a charging station

Chargers 1-Mile off an Exit Requirement

One state received approved exceptions from the 1-Mile off an exit requirement for the following reasons:

- Preventing unfair competition between an existing charging station and a newly built station that is subsidized through the federal program

Additional Considerations

States are already considering future exceptions. The following is a non-exhaustive list of themes explored:

- Mobile charging is being explored to accommodate future resiliency needs
- Concern that nevi-compliant charging stations will not be profitable, especially during peak demand, giving rise to future exceptions
- One state is exploring a request to waive out of the Buy America requirement
- Considering the impacts and outcomes and exploring exceptions that would improve the benefits or decrease the burdens to DACs/Justice 40 Communities, in certain circumstances, like the 1-mile and 50-mile requirements.

Question for CEC & Caltrans + Contact Information

Question for CEC & Caltrans

1. What are the methodologies being used to measure uptime and remediate non-working stations. What software and staffing is being proposed (or expected) by the State, and what warranties or damages apply in case of a breach?

Deloitte Contact Information

Michelle Boehm

Specialist Leader | Government & Public Services

Deloitte Consulting LLP

Tel/Direct/Mobile: 323-627-2678

miboehm@deloitte.com