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Comments regarding the NEVI Preâ€Solicitation Joint Workshop

Additional submitted attachment is included below.

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September 28, 2022

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 22-EVI-05
715 P Street
Sacramento, CA 95814

Re: Docket No. 22-EVI-05 - Comments of the Center for Sustainable Energy® regarding the National Electric Vehicle Infrastructure Pre-Solicitation Joint Workshop

The Center for Sustainable Energy® (CSE) appreciates the opportunity to provide comments in response to the National Electric Vehicle Infrastructure (NEVI) Pre-Solicitation Joint Workshop hosted by the California Energy Commission (CEC) and California Department of Transportation (Caltrans). CSE appreciates the CEC's and Caltrans' efforts to propose requirements and ranking processes for the NEVI program. CSE is excited to contribute to the development of this program to ensure the effective utilization of federal funds.

CSE is a national nonprofit that is transforming markets for clean transportation and distributed energy resources through software-enabled program design, program administration, and policy analysis and guidance. CSE administers cutting-edge programs for governments, utilities, and the private sector across the United States. CSE's independence and data-driven approach have made it a trusted resource and partner for over 25 years. CSE provides these comments based on our experience designing, implementing, and evaluating statewide electric vehicle (EV) and electric vehicle infrastructure (EVI) incentive programs in California, Connecticut, Massachusetts, New Jersey, New York, Oregon, and Vermont, which collectively translates to nearly $3 billion worth of program value under management. In California, CSE implements the California Electric Vehicle Infrastructure Project (CALeVIP) on behalf of the CEC.

CSE highlights the need for data-driven planning to effectively deploy EV infrastructure under the NEVI Program. CSE recommends the CEC include additional ranking factors to enhance the corridor group ranking process and dedicate additional resources to enable communities to inform the charger deployment process. Accordingly, CSE offers the following recommendations:

1. Enhance the corridor group ranking process by incorporating additional variables, including local charging demand, population density, housing density, forecasted EV fleet size, and distance to the closest available chargers.
2. Empower community decision-making by utilizing interactive platforms that simultaneously overlay multiple variables and map results.
3. Adopt standardized and harmonized program requirements that complement existing initiatives.

CSE's responses are discussed in detail below.

1. Enhance the corridor group ranking process by incorporating additional variables, including local charging demand, population density, housing density, forecasted EV fleet size, and distance to the closest available chargers.

CSE appreciates the efforts of the CEC and Caltrans to rank corridor segment groups based on key variables. While CSE supports the variables that were included in this ranking process, CSE contends that incorporating additional variables will enhance the analysis, as detailed below.

First, CSE recommends the CEC forecast and incorporate local charging demand in addition to the long-distance charging demand identified through the EVI-Road Trip tool and road traffic counters. While CSE recognizes the importance of identifying long-distance charging needs along highway corridors, CSE highlights that local demand for fast charging is equally important since the majority of EV drivers travel less than 100 miles per day.[1] While the proposed methodology of relying on traffic count data and EVI-Road Trip's projections of charging demand is a valid method of comparing likely EV activity between segments, it does not factor in demand from local EV driving from the surrounding community. EV charging stations that are located within one mile of the on- or off-ramps can be accessed by local drivers who take trips outside of the highway system, especially for those who lack access to home charging or have limited access to or knowledge of other nearby public charging stations. CSE highlights that the inclusion of local charging demand is consistent with the Federal Highway Administration's (FHWA) goal to "make EV chargers accessible to all Americans for local to long-distance trips," as outlined in the draft guidance on the NEVI Program.[2]

[1] Environmental Protection Agency, Electric Vehicle Myths. https://www.epa.gov/greenvehicles/electric-vehicle-myths#note2

[2] Federal Highway Administration, The National Electric Vehicle Infrastructure (NEVI) Formula Program Guidance, page 5.

Second, CSE recommends the CEC incorporate population density as a variable in the corridor group ranking process. CSE notes that none of the variables included in the ranking process take into consideration the population along designated corridors, which makes it difficult to quantify how many people, especially those living in disadvantaged and low-income communities, will benefit from the addition of new chargers. While CSE acknowledges the importance of building out a robust fast charger network that covers the entire state, CSE contends that incorporating population data will help direct chargers and associated benefits towards those regions with the greatest density of individuals, which will increase overall program benefits.

Third, CSE recommends the CEC incorporate housing distribution into the corridor group ranking process. Including factors such as the presence of single-family, multi-family, and affordable housing units will prioritize the deployment of chargers in regions where people live but may not have access to charging. This will be especially important for residents of multi-family units, who experience greater challenges in accessing reliable charging. CSE reiterates the importance of utilizing NEVI Program funds to address charging demand from both local- and long-distance travel.

Fourth, CSE recommends the CEC incorporate forecasted EV fleet sizes into the corridor group ranking process. Not all regions and communities are expected to adopt EVs at an equal rate, and charging infrastructure needs will vary across geographies and community types. As a result, CSE suggests that the CEC and Caltrans may wish to prioritize funding for those regions that need it the most or where a lack of infrastructure availability prevents widespread EV adoption. Understanding the projected EV fleet size in the coming years will inform the ranking process and enable the CEC to shift funding allocations towards priority sectors.

Fifth, CSE recommends the CEC incorporate additional variables based on travel data analysis to more precisely characterize the distance between corridor groups and existing fast chargers, which is currently driven by the CEC's Senate Bill (SB) 1000 analysis. While CSE appreciates the CEC's inclusion of information from the SB 1000 analysis and acknowledges distance to chargers is an important measure, incorporating additional information from travel data analysis can provide more accurate assessments of whether an individual has access to a charger along a frequently-traveled route. For example, even if an individual in a disadvantaged or low-income community does not have reliable access to a charger near their home, there may be one on

https://www.fhwa.dot.gov/environment/alternative_fuel_corridors/nominations/90d_nevi_formula_program_guidance.pdf

the way to or near their workplace. Understanding these travel patterns may provide insights into ideal charging locations.

2. Empower community decision-making by utilizing interactive platforms that simultaneously overlay multiple variables and map results.

CSE supports the efforts of the CEC and Caltrans to prioritize access to EV infrastructure for residents of disadvantaged, low-income, and Justice40 communities and federally-designated tribes. To better understand and support the needs of these communities, CSE encourages the CEC and Caltrans to dedicate resources for meaningful community engagement to enable community members and community-based organizations (CBOs) to inform the prioritization of corridor segments and the eventual siting of chargers. CSE notes that community engagement was identified as a requirement in the FHWA's draft guidance on the NEVI program[3] and that the FHWA's proposed rulemaking on minimum NEVI standards requires states to submit annual community engagement reports detailing the state's efforts to respond to community feedback.[4] CSE also highlights that other federal EV charging programs authorized under the Infrastructure Investment and Jobs Act dedicate five percent of program funds for community engagement.[5] To enhance community engagement initiatives, CSE recommends the CEC dedicate funding for interactive data platforms that enable communities to rank variables in importance (as determined by local stakeholders), display the results on a map, and determine if proposed segments have the potential to address community-identified needs.

CSE highlights the value of using technology platforms to integrate multiple variables on location suitability into a holistic planning effort. For example, the current corridor group ranking process incorporates equity definitions from the Federal Justice40 Initiative and California state law. Technology platforms exist that can prepare a geographic information system (GIS) overlay that combines multiple equity definitions onto one map, enabling decision-makers and community members to identify locations that meet multiple sets of requirements. These platforms can also overlay the existing environment onto the map and auto-populate the region with charging sites that meet goals based on ranked priorities. This rapid, iterative process of ranking locations based on evolving priorities can enable decision-

[3] *Id.*

[4] Federal Register, National Electric Vehicle Infrastructure Formula Program. https://www.federalregister.gov/documents/2022/06/22/2022-12704/national-electric-vehicle-infrastructure-formula-program

[5] Public Law 117-58, Section 11401(k).

makers and community members to instantly compare scenarios, better understand planning variables, and make decisions to maximize community benefits.

CSE also highlights the potential for online data platforms to promote community engagement and enhance transparency. CSE recommends Caltrans and the CEC develop a data visualization platform that enables the public to directly interact with ranking variables and data layers, including maps. This public platform can enable stakeholders to instantaneously access information, adjust variables that reflect their priorities, and assess charger locations along priority corridor segments. Additionally, CSE recommends Caltrans and the CEC develop a dashboard to highlight key program data, including the number of chargers deployed, the distribution of chargers across geographies, and the level of funding allocated, particularly in disadvantaged and low-income communities and tribal nations. CSE notes that CEC staff had indicated during the first session of the workshop that they had not yet considered developing a dashboard for the NEVI Program. CSE contends that program dashboards, such as those used for CALeVIP, can increase transparency for stakeholders and highlight progress in achieving state goals.

3. Adopt standardized and harmonized program requirements that complement existing initiatives.

CSE supports the CEC's proposed requirements for the NEVI Program. CSE recommends that the NEVI requirements be standardized to align with requirements for existing and forthcoming CEC programs and harmonized to complement federal requirements around data collection and reporting. For example, CSE notes that the proposed requirements for NEVI funding applicants to provide preliminary site designs, utility letters, and site host letters align with requirements proposed for CALeVIP 2.0, which is being designed and implemented by CSE. Adopting aligned and harmonized requirements will provide applicants with consistency when developing projects across the state.

CSE recommends that the CEC adopt a qualified product list of EV charging equipment that meets minimum project requirements. Additionally, CSE recommends that this product list be aligned with the existing equipment list used for CALeVIP,[6] as well as any future product lists developed by the FHWA or Joint Office of Energy and Transportation for use in the NEVI Program. Using a standardized list will enhance clarity for funding applicants and streamline charger deployment. CSE suggests that this list be referenced on all relevant program websites,

[6] California Electric Vehicle Infrastructure Project, Eligible Equipment List. https://calevip.org/sites/default/files/docs/calevip/CALeVIP_Eligible_Equipment.pdf

be updated annually, and be updated in coordination with EV service providers (EVSPs), manufacturers, and other stakeholders.

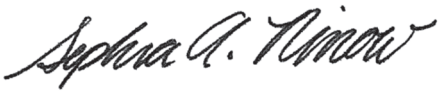
CSE also encourages the CEC to utilize the data collection requirements established for CALeVIP and apply these to NEVI-funded projects. The CALeVIP data collection requirements have already been agreed to and acted upon by the major EVSPs, several of which have begun to submit data to CSE. Aligning requirements across CALeVIP and NEVI will leverage industry-accepted standards, prevent duplicative data collection efforts, allow charger utilization data to be compared across geographies and programs regardless of funding source, and enhance the evaluation of key program parameters.

In addition to data collection standards, CSE recommends that the CEC adopt the detailed and standardized data reporting protocols used for CALeVIP, which will facilitate the transfer of EV charger data that has been aggregated by the EVSPs. CSE encourages the CEC to rely on the standardized data request documents and template data sharing agreements that were developed for use in CALeVIP. This will ensure that all data is submitted in a consistent manner to streamline data collection, storage, and analysis.

Conclusion

CSE appreciates the opportunity to provide comments regarding the NEVI Pre-Solicitation Joint Workshop. CSE appreciates the efforts of the CEC and Caltrans in implementing the NEVI Program and looks forward to further informing the deployment of EV infrastructure in California.

Sincerely,



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