DOCKETED	
Docket Number:	20-TRAN-04
Project Title:	Electric Vehicle Infrastructure Project Funding
TN #:	246399
Document Title:	San Francisco Bay Area Rapid Transit District Comments - CEC CHiLL-2 Program
Description:	N/A
Filer:	System
Organization:	San Francisco Bay Area Rapid Transit District
Submitter Role:	Public Agency
Submission Date:	10/10/2022 10:09:40 AM
Docketed Date:	10/10/2022

Comment Received From: San Francisco Bay Area Rapid Transit District
Submitted On: 10/10/2022
Docket Number: 20-TRAN-04

CEC CHiLL-2 Program - BART Comments

Additional submitted attachment is included below.

SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT
2150 Webster Street
Oakland, CA 94604-2688

October 10, 2022

RE: California Energy Commission's (CEC) Pre-Solicitation Workshop for Convenient, High-Visibility, Low-Cost Level-2 Charging (CHiLL-2)

Dear California Energy Commission,

Thank you for the opportunity to provide feedback on CEC's CHiLL-2 Proposed Solicitation. The San Francisco Bay Area Rapid Transit District (BART) supports the goal of the solicitation to increase visibility of publicly accessible Level 2 electric vehicle (EV) chargers.

BART provides regional transit service, connecting five counties and four of the Bay Area's largest cities (San Jose, San Francisco, Oakland, and Fremont), on 135 miles of track connecting 50 stations. Pre-pandemic ridership was over 410,000 weekday passengers. The vast majority of BART's passenger rail service is electrified, using 100% greenhouse gas-free electricity in 2020 and 2021. BART maintains over 47,000 customer parking spaces located across 35 of its passenger stations, many of which are situated in or walking distance to a marginalized community. BART stations are close to multifamily housing, workplaces, public destinations, medical facilities, retail locations, and many other services. These parking facilities provide an opportunity to site publicly accessible EV charging infrastructure to support more equitable EV adoption.

Through this program, the CEC can actively support BART's goals outlined in the Board-approved Electric Vehicle Charging Policy. These policy goals are:

- Greener and Healthier Communities
- Equitable Access
- Intelligent and Scalable Operations

BART prepared the following comments to provide input to the CEC from the perspective of a potential site host and program applicant. BART welcomes the opportunity to work with the CEC to increase access to EV charging in disadvantaged communities.

BART intends to add Level 2 EV chargers to 3% (or 1,380) of BART parking spaces across the District, with make-readies available for an additional 2,860 parking spaces and electrical capacity available for e-bike or other micro mobility charging, if possible. Once EV chargers are fully installed, this would create 10% coverage at parking garages. Additional make-readies will not be installed at surface parking lots, as BART expects those facilities to be converted into transit-oriented developments with parking garages before additional EV chargers are needed. BART is finalizing program specifics to find a third-party partner and expects EV charging installation to begin in 2024, with all locations installed within 5 years. Installation locations can be prioritized to ensure CEC's proposed program timing aligns with BART's timing.

BART stations are well located to provide greater access to charging infrastructure for a larger population than current public chargers serve. Over 30% of BART stations are located within a disadvantaged community, with many more located within half a mile (walking distance). With public chargers available in, or near, disadvantaged communities, EV owners could use those chargers as their primary chargers regardless of whether they are using transit or not. This increases overall charging utilization and community benefit since community members can charge during evenings and weekends, when the demand for EV charging from transit riders is

the lowest and parking is free. This project can serve as a model for other transit agencies to provide EV charging for their riders and communities, as well.

As a pilot program, BART has 42 EV charging plugs at the Warm Springs Station. On average, EV drivers park at these chargers for over 7 hours, while only charging for a fraction of that time. Due to this long dwell time of transit parking users, BART will likely use load management to reduce upfront electrical costs while still ensuring drivers get sufficient charge.

BART compiled the below metrics to help evaluate the success and health of the EV charging program:

- Number of stations and ports installed
- Average cost per port installed
- Cost analysis of drivers
- Grant funding applied for
- Grant funding received
- kWh consumed
- Number of charging sessions
- Number of individual users
- Charger utilization rate
- Charger idle time, while occupied
- Level of access for EV drivers (100% utilization rate)
- Electric miles enabled by EV charger network
- Greenhouse gas reductions
- Charging station reliability
- Time to repair chargers
- Charging costs vs revenues
- Average rate costs by utility
- Hourly charging load and demand by station
- Average maintenance and repair costs per port
- Quarterly profit and loss statement
- Customer Satisfaction Customer feedback on availability, payment, and functionality

As it complements BART's proposed program, BART supports the CHiLL-2 solicitation. The 500-charger minimum with 50% within disadvantaged communities and public availability are all achievable. These requirements can be met through BART's EV charging program. BART respectfully requests the CEC consider updating the following program requirements:

Minimum of two site types per project
Since all BART parking is transit parking, BART would not be able to participate as an applicant if two site-types are required. Even though BART parking is classified as one site-type per the proposed eligibility, BART parking is part of a multi-modal transit hub that serves many uses and connects with many other transit agencies. BART serves as workplace parking for commuters who drive, park, and take BART to places of employment. Stations also serve as major transportation nodes for riders taking BART to other destinations including medical appointments, grocery, shopping, to visit family and friends, and entertainment. Stations also serve multifamily housing (MFH) as they are within walking distance to over 16,000 units, including over 2,700 affordable housing units. During evening and weekends, EV charging at BART parking would be available to the public, including surrounding community members, even if they don't currently frequent BART. Over 30% of BART stations are in disadvantaged communities and more than half fall within catchment areas that are classified as either high minority, low income, or both.

All chargers must be installed within a one-mile radius
BART stations are typically located more than one mile apart. There are a few stations where BART could meet this requirement; however, 250 chargers located at each station far exceeds BART's EV charging program goals. This requirement may also restrict the ability to achieve 50% of chargers located within a disadvantaged community. Increasing this requirement to a three-mile radius would spread the benefit of EV chargers over a wider geographical area and provide the program with more options for charger installation. A few examples of these three-mile clusters include Fruitvale, Coliseum, and San Leandro stations; MacArthur, Rockridge, Orinda, and Ashby stations; Richmond, El Cerrito Del Norte, El Cerrito Plaza, and North Berkeley stations.

Requiring installation locations have streamlined EV charger permitting
As a Special District, BART does not issue permits for charging installation. That said, BART would like to ensure that BART would be eligible for this program and respectfully requests including language to clarify eligibility. Potential language could include: "If the jurisdiction, where the chargers are to be installed, issues EV charging permits, this grant is only available for locations in jurisdictions which have implemented streamlined permits for charging."

BART welcomes the opportunity to work with the CEC on this program. Should you have any further questions regarding BART's comments, please do not hesitate to contact me at MMeaghe@bart.gov. Thank you for your consideration.

Sincerely,

Monica Meagher
Group Manager, Sustainability