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CalETC and EVCA's Joint Comments on AB2127 Second Assessment Workshop

Additional submitted attachment is included below.



October 14, 2022

Fuels and Transportation Division
California Energy Commission
Re: Docket No. 19-AB-2127

Re: Comments on the AB 2127 Second Assessment Kickoff Workshop September 19, 2022

The California Electric Transportation Coalition (CalETC) and Electric Vehicle Charging Association (EVCA) appreciate the opportunity to provide comments on the AB 2127 Second Assessment Kickoff Workshop held on September 19, 2022.

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.

EVCA is a non-profit trade organization of 19 leading EV charging industry member companies and two zero-emission autonomous fleet operators. EVCA's mission is to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the expeditious and efficient adoption of EVs and deployment of EV charging infrastructure.

CalETC and EVCA appreciate the CEC's work on this important effort. The AB 2127 Report ("Report") is a critical tool to help guide the state's transportation electrification planning efforts. However, we believe that the Report could be improved by providing additional details to inform the deployment of charging infrastructure in underserved communities, including equity, low-income, and rural communities. As such, we offer the following suggestions for data that should be included in the AB 2127 Report:

- Projected data on the expected rate of home charging through 2035, for both single-family and multifamily homes, and identification of key barriers to charging infrastructure installation in both housing segments, including whether the homes are owner occupied or a rental. Generally, renters cannot install or upgrade their home charging without the

owner's approval. Information on key barriers will be critical to ensuring that home chargers are installed at the appropriate rate in underserved communities.

- An analysis of the opportunity for individuals from underserved communities to secure gainful employment in the deployment of charging infrastructure, particularly in their own communities.
- An assessment of the charging needs for rural areas, a segment that is often difficult to electrify given geographic conditions.
- An analysis of curbside charging needs. Curbside charging can be a helpful overnight option for residents of multi-family houses and single-family homes that do not have dedicated parking spaces. Curbside charging can offer drivers a more cost-effective charging option as compared to DCFC charging.
- An analysis of ride hailing electrification needs through its WIRED model in this next iteration of AB 2127 reports. Analysis has shown that the use case and charging profiles of light duty electric ride hailing vehicles, both in transportation network companies (TNCs) and in light duty fleets, is profoundly different from personal vehicle charging behavior. Even with growing instances of home charging, these vehicles use cases often rely on charging infrastructure differently, with more frequent sessions at DC fast chargers, charging occurring at depots, and more granular responsiveness to different grid and rate signals. CalETC encourages the CEC to further modify the WIRED model to capture the emergence of centrally managed electric ride hail fleets more accurately, such as those used by autonomous vehicle operators, as these vehicles do not have access to home charging and may increasingly rely on public charging infrastructure alongside private charging. The CPUC's ongoing Clean Miles Standard rulemaking also makes clear the need to model out ride hailing infrastructure needs, given the expected compliance deadlines of 2030 for full electrification of this segment.
- An analysis of the panel upgrades needed for both business and residential customers located in underserved communities. Understanding the full extent of the need for panel upgrades in these communities will allow the state and private sector to appropriately focus funding and address this critical need.

Thank you for your consideration of our comments. Please do not hesitate to contact us at laura@caletc.com or reed@caleec.com should you have any questions.

Sincerely,

Laura Renger
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