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*Comment Received From: Adam Mohabbat
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Wallbox Comments on Communities in Charge

Please see attached document.

Additional submitted attachment is included below.



October 25, 2022

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

CALSTART
48 S Chester Ave
Pasadena, CA 91106

Re: Wallbox Comments on Communities in Charge Public Workshop

To Whom It May Concern:

Wallbox thanks the California Energy Commission (CEC) and CALSTART for the opportunity to comment on the upcoming Communities in Charge program. California and the CEC continue to be leaders in implementation of exemplary public funding programs for transportation electrification, and Wallbox thanks the agency and program administrators for robust stakeholder engagement to deliver the most effective programs.

For context, with more than 240,000 chargers sold in over 100 countries to date, Wallbox is a leading global EV supply equipment (EVSE) manufacturer and energy management solutions company with North American headquarters in Mountain View, CA. Wallbox aims to address the challenges of climate and energy management via state-of-the-art EV charging solutions.

Wallbox commends the CEC for thoughtful implementation of the next generation of California's flagship EVSE block grants. These rebates have remained one of the most effective tools California has to deliver the scale of charging needed to support California's electrification goals, including 1.2 million chargers needed by 2030.¹ Through the Communities in Charge program, the CEC has the opportunity to directly address largescale charging gaps for Level 2 charging – the predominate form of charging today and in the future - throughout the state, including in priority use cases like multi-unit dwellings and workplace charging.

As the CEC and CALSTART collect feedback to finalize the program design and requirements for Communities in Charge ahead of the early 2023 project launch, Wallbox expresses strong support for the program and respectfully puts forth the following recommendations that balance increasing equitable access with business model inclusivity, leveraging strong private investment, and delivering convenient, reliable charging experience for all drivers.

Wallbox looks forward to supporting the state in the successful deployment of charging infrastructure across California.

Best,

A handwritten signature in black ink, appearing to read "Adam Mohabbat", written in a cursive style.

Adam Mohabbat
Policy Director, North America
adam.mohabbat@wallbox.com

¹ AB 2127 Electric Vehicle Charging Infrastructure Assessment - Analyzing Charging Needs to Support Zero-Emission Vehicles in 2030 (Commission Report)

1. Wallbox supports the minimum and maximum connector port requirements:

Wallbox believes that the proposed site minimum and maximum ports requirements – 4 and 20 respectively, with the exception of 40 maximum ports at multi-unit family residences – as appropriate sizes for the program. As EV adoption continues to accelerate in the state, the need to build increasingly larger sites scales commensurately. These site sizes are bolstered by stronger municipal EVSE readiness codes encouraging larger buildouts. Further, the exception of a max 40 chargers for the multi-unit family residences is welcome. Multi-unit residences are a longstanding challenge to install chargers in due to various constraints. While some of these hurdles are being addressed via policy actions, the wide latitude to deploy large scale installations is encouraging and a great incentive to close this gap in charging access.

2. To optimize the program's reach include workplace charging and multi-unit dwellings with HOAs as eligible project types:

As requested during the public workshop, Wallbox strongly supports the inclusion of workplace charging as an eligible site type for the Communities in Charge program. Along with home charging, workplace charging represents a critical charging destination for drivers in their day to day lives. This is especially true for drivers who may not have access to home charging. The gaps in access to charging should be tackled on all fronts and that includes the workplace. Thus far, much of the funding for workplace charging has come through the public or investor-owned utilities (IOUs). Given that this program funding is not stackable with IOU funding, this is an important opportunity for the CEC to fund sites outside of these and provide additional infrastructure coverage. The inclusion of workplace charging as an eligible category is also something seen in other leading rebate programs, including Colorado's Charge Ahead program.²

Lastly, the exclusion of any properties with homeowner association fees, otherwise known as HOAs, is unduly restrictive as it would preclude many affordable multi-family units in low income or otherwise priority communities in need of charging infrastructure. Limiting the site eligibility to locations without homeowner association fees severely limits the eligibility pool for otherwise viable sites in need of electrification. Wallbox recommends removing this site eligibility exclusion.

3. Wallbox recommends the launch of a second project round in mid-2023:

During the workshop, program administrators stated that while allocations from the General Fund have not yet been allocated, therefore limiting the programs current visibility to this first program launch, they do predict a second round of program funding for the mid-year 2023 i.e. July or August. Wallbox strongly supports this timeline. By planning for a mid-year launch, there will be ample time for program administrators to process the first round of this program given the new application and rebate process along with taking in lessons learned from the first round. CALSTART has done an excellent job with stakeholder engagement, and Wallbox encourages program administrators to continue engagement with EVSE manufacturers, installers, and community groups to ensure program efficacy moving forward.

Wallbox encourages staff to announce the launch date for the second round of funding as soon as staff identifies it. By setting pre-scheduled, and pre-published funding windows, the program allows charging companies and stakeholders across the value chain the opportunity to adequately prepare the most project ready applications that meet state priorities, including equity and reliability.

² Charge Ahead Colorado, Colorado Energy Office, <https://energyoffice.colorado.gov/zero-emission-vehicles/grants-incentives/charge-ahead-colorado>