

DOCKETED

Docket Number:	20-TRAN-04
Project Title:	Electric Vehicle Infrastructure Project Funding
TN #:	248839
Document Title:	CalETC Comments on CEC's LD Investment
Description:	N/A
Filer:	System
Organization:	California Electric Transportation Coalition/Laura Renger
Submitter Role:	Public
Submission Date:	2/17/2023 10:23:34 AM
Docketed Date:	2/17/2023

*Comment Received From: Laura Renger
Submitted On: 2/17/2023
Docket Number: 20-TRAN-04*

CaIETC Comments on CEC's LD Investment

Additional submitted attachment is included below.



February 17, 2023

California Energy Commission
Re: Docket No. 20-TRAN-04

Re: Workshop on Funding Allocations for Light-Duty Passenger Electric Vehicle Charging Projects

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the Workshop on Funding Allocations for Light-Duty Passenger Electric Vehicle Charging Projects, hosted by the California Energy Commission (CEC) on January 26, 2023 (“the Workshop”).

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 is comprised of electric utilities, and 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.

As mentioned during the Workshop, CalETC supports the proposed solicitations. CalETC also recommends that the CEC analyze the current rate of annual charger installations to determine whether or not the state is on track to meet the goal of 250,000 chargers installed by 2025¹. It is imperative that we meet this milestone goal, both to ensure that electric vehicle drivers have access to adequate charging, and to provide confidence to the state and the rest of the nation that California is on course to achieve the 2030 greenhouse gas emissions reduction goal and carbon neutrality by 2045. CalETC looks forward to continuing to work with the CEC and other stakeholders on this important effort.

With regard to the discussion topics raised at the Workshop, CalETC is pleased to provide the following feedback:

CalETC recommends prioritization of projects that utilize non-proprietary technology such as Open Charge Point Protocol (OCPP) communications. The utilization of OCPP communications helps to mitigate the risk of stranded assets by allowing a new network provider to easily step in if the original provider goes out of business or is no longer in service.

CalETC supports development of resiliency projects that can be operated during outages, projects that require minimal grid upgrades and both load management and load sharing, as appropriate.

¹ Executive Order B-48-18.

CalETC agrees that it is desirable to advance projects that require little (or no) upgrades to the electric grid. Where the grid has excess capacity, it is less costly and more time efficient for charging station providers to utilize that existing capacity. We also support projects that have the ability to operate during grid outages. However, there may be some situations in which grid upgrades will be cheaper than installation of onsite storage and/or load sharing or load management can be utilized to meet the capacity needs. CalETC recommends that the CEC support the most cost-effective solution for each project.

Investment in equity communities must be prioritized. CalETC applauds the CEC's focus on priority communities and recognizes that this focus is critical to ensuring that no communities are left behind in the transition to electric transportation. In order to appropriately prioritize equity projects, CalETC supports development of a screening criteria that would positively weight projects that provide equitable charging rates and train and hire labor from the priority communities where the charging stations are to be located.

CalETC urges the CEC to both allow for flexibility in approach to its light duty solicitations and to pursue an array of charging stations that best meet driver and community needs. CalETC supports allowing local jurisdictions flexibility to determine the best charging solution for each unique locational need. That said, we also recognize that curbside charging will play an important part in the charging ecosystem. On-street parking is one of the most common parking options for drivers who do not have access to home charging. Curbside charging can be deployed in areas with little real estate and level 2 curbside stations can serve as a "home-adjacent" overnight charging solution. Therefore, we strongly support the Commission creating a dedicated funding program for curbside chargers (including level 2 stations).

CalETC also supports the build out of large fast charging plazas and fast charging to support multi-family dwellings. Large fast charging hubs can increase customer confidence in the availability of charging and provide a charging solution for multi-family dwellings that may not have access to a dedicated charger. Accordingly, CalETC supports the inclusion of fast charging in the CEC's Multi-Family Affordable Housing Sites concept.

Lastly, CalETC supports CEC's Fast and Available Charging for All (FAST) program and Municipal Fleet Solicitation (MFS) as FAST will play a critical role in supporting the electrification of high-mileage TNC and other on-demand vehicles. CalETC encourages the Commission to expand these efforts in the future, and encourages the CEC to open up the solicitation for all light-duty fleets, including private fleets, which represent one of the largest near-term opportunities for transportation electrification at scale.

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Thank you for your consideration of our comments. Please do not hesitate to contact me laura@caletc.com should you have any questions.

Kind regards,

A handwritten signature in black ink, appearing to read 'Laura Renger', with a long horizontal line extending to the right.

Laura Renger, Executive Director
California Electric Transportation Coalition