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GRID Comments Re Workshop of Funding Allocations for Light-Duty Passenger EV Charging Projects

Additional submitted attachment is included below.

17 February 2023

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

VIA DOCKET

Energy Commission Docket 20-TRAN-04
Re: 20-TRAN-04, California Energy Commission Electric Vehicle Project Funding

Dear Commissioners:

GRID Alternatives (GRID) submits the following comments in regard to the 26 January 2023 Light-Duty Electric Vehicle Infrastructure Allocation Workshop.

Foremost, GRID recognizes that the California Energy Commission (CEC) is taking a thoughtful approach to ensure electric vehicle funding, programs, and resources are able to successfully reach and positively impact all communities across the state. Our comments are based on GRID's single-family program administrator experience, and our single-family implementer experience directly assisting communities access, and benefit from, equitable distributed energy resource programs for nearly twenty years.

GRID provides the following recommendations to help the CEC design an electric vehicle (EV) light duty (LD) program that successfully deploys equitable at-home charging infrastructure to low-income residents and residents of disadvantaged communities in an efficient, effective, and timely manner.

I. Charging at Single-Family Households

There are millions of low-income single-family homeowners across the state that want to refuel at home using electricity, and stand to benefit tremendously from the low energy costs and time

savings that home EV charging offers, but currently face substantial barriers. The CEC recognizes that a flexible block grant approach has the potential to proactively ensure single-family households have a positive experience removing barriers and adopting EVs.

To this end, GRID supports the CEC's tentative solicitation concept that envisions a third-party rebate implementer partnering with trusted Community-Based Organizations (CBOs) and local governments to ensure relevant and actionable information is available for households in each unique community across California. The most important element of a successful clean energy program is making sure potential participants clearly understand how the program services specifically address household-specific barriers. Making sure households feel comfortable making a very large decision to rely on electricity as fuel will require the time and commitment of a mission-based service-oriented organization.

Accordingly, GRID supports the CEC's vision to require an outreach plan that can integrate with existing energy equity and complimentary home electrification programs. A single-family household should be able to learn about all relevant programs they qualify for from a trusted and experienced expert. To do this, GRID strongly recommends leveraging a one-stop-shop application system, such as the California Air Resources Board's Access Clean California program, which was one of the top recommendations outlined in the SB 350 Low-income Barriers Report[1] and the CEC's SB 350 Barriers Study.[2] The one-stop-shop approach is critical to making sure the user experience is positive, efficient, and impactful, while helping ensure that participants can access as many different equity incentives as possible in one place. In GRID's experience, the result of a positive user experience typically translates into neighbors telling neighbors about the benefits of a helpful program, which has the effect of building program trust while ensuring continued program success.

GRID strongly supports the CEC's proposed block grant approach that can provide rebates, marketing education, outreach support, and expert program administration designed to help income-qualified families purchase L2 home chargers (or L1 if preferred), panel replacements or upgrades, and automatic transfer box/switches, as relevant, to save money on fuel costs.

GRID is pleased to provide the below responses to each of the questions highlighted in the 26 January workshop.

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[1] https://ww2.arb.ca.gov/resources/documents/carb-barriers-report-final-guidance-document
[2] https://www.energy.ca.gov/rules-and-regulations/energy-suppliers-reporting/clean-energy-and-pollution-reduction-act-sb-350/sb

1. **How can incentives be aligned with EV ownership or potential EV ownership?**

GRID believes strongly that aligning and coordinating home EV charging incentives with incentives for EV ownership will be critical to the success of this new program, based on our experience implementing EV ownership and EV charging programs for income-qualified households for CARB, regional air districts and utilities, and other program implementers. This experience includes:

- GRID has partnered with the Bay Area Air Quality Management District (BAAQMD) and other regional air districts to implement the California Air Resources Board (CARB) Clean Cars 4 All (CC4A) Program to assist income-qualified drivers to scrap their gas-powered vehicle and replace it with an EV or a zero-emission mobility alternative (e.g. e-bike).

- GRID serves as the statewide administrator for CARB's Access Clean California statewide EV equity outreach program, providing one-stop-shop access to CARB-funded EV purchase incentives and other related equity incentives, through a combination of a centralized digital benefits finder that allows qualifying households to identify which incentives are best for them and begin their applications; a statewide network of community-based organizations, tribal governments, labor unions, and other trusted local outreach partners; and a coordinated case management system to provide applicant support.

- GRID implements home EV charging programs for the CARB-funded Financing Assistance programs that help income-qualified Californians purchase electric vehicles, the Clean Vehicle Assistance Program administered by Beneficial State Foundation, and the Driving Clean Assistance Program administered by Community Housing Development Corporation.

- GRID also serves as the program administrator for PG&E's upcoming Empower EV home EV charging incentive program, California's first ever utility-run home charging program for income-qualified EV owners.

Across all of these experiences GRID has seen how critical it is to align incentives for charging with incentives for EV ownership, particularly because those two offerings are part of a single consumer decision and process of switching from a gasoline-powered vehicle to electricity. Aligning and consolidating customer-facing program delivery provides a better experience for

consumers, for community-based organizations, for program administrators, and for state agencies, reducing confusion while avoiding costly duplication of efforts in areas such as community outreach. Strategies for aligning new incentives with existing EV ownership programs for consideration include:

- **Categorical eligibility.** Participants in existing income-qualified EV equity purchase programs such as CC4A and Financing Assistance should be automatically eligible for income-qualified home charging support, without requiring participants to go through a second process to prove that they qualify. Income qualification is both invasive for participants and costly and time intensive for administrators, so this is a win for everyone.

- **Integrated outreach.** Outreach for home EV charging rebates should be integrated with outreach for existing EV purchase programs, so that consumers can be offered comprehensive solutions for both EV purchase and EV charging at once. This is also a win for both consumers and program administrators, by eliminating the burden to piece together multiple incentive programs while allowing the CEC to "piggyback" and leverage outreach investments from other agencies such as CARB.

- **Stacking of Incentives.** Some existing EV purchase programs provide funding for home charging already, while others do not, and even when funding for charging is available, there are often funding gaps, particularly around funding being available to upgrade their service panel and (re)wiring needs. Making these new incentives "stackable" with existing incentives will allow CEC to leverage those existing investments while ensuring that customers have a much more positive experience depending on electricity as fuel.

Furthermore, these electrification-ready households will be much more apt to benefit from the menu of home electrification technology incentivized through the Inflation Reduction Act (IRA). For example, the Reliability, Renewable Energy and Decarbonization Division at the CEC recently filed a Memo to Open a New Docket (23-DECARB-01) to support IRA implementation. The High-Efficiency Electric Home Rebate Program (HEEHRA) will include rebates for service panel replacement and wiring upgrades, greatly assisting the decision to purchase an EV.[3]

2. How can this concept better expand at-home charging opportunities to renters who own EVs?

GRID sees some significant gaps in the marketplace, particularly in the communities we serve, in terms of unlocking EV charging for renters who live in single-family homes, duplexes, and other

[3] https://www.energy.ca.gov/programs-and-topics/programs/inflation-reduction-act-residential-energy-rebate-programs-california

properties that pair the physical characteristics of single-family homes with the social challenges of multifamily housing, such as the differing financial goals between landlords and tenants.

The CEC's proposed block grant structure provides a natural mechanism to serve this market. We recommend that the overall program be structured flexibly so that these projects are not categorically excluded from participation, and that the proposed solicitation for third-party rebate implementers offer the opportunity for applicants to propose strategies to provide at-home charging for renters.

GRID also recommends that the eligibility criteria for this concept be coordinated with the eligibility criteria for the CEC's REACH 2.0 and proposed program for charging at multi-family affordable housing sites, to ensure that all rental properties are eligible for at least one of the programs. Many existing government programs, such as the CPUC's Solar on Multifamily Affordable Housing (SOMAH) program and federal housing finance programs, define multifamily housing as having five or more units, so the single-family program could be defined as serving 1-4 unit properties.

3. How should the CEC value tiered incentives for equipment that enable households to participate in V2H, V2G, and DR programs?

GRID is committed to designing accessible people-centered programs that can also contribute to meeting complimentary state policy goals. To ensure more resources are available to help alleviate net peak demand, GRID recommends the CEC adopt a tiered rebate structure that covers the full charger unit cost for a bi-directional L2 EV charger to enable participation in V2H or V2G. By allowing a rebate adder to cover the unit cost, the CEC ensures participating households help reduce grid congestion because the L2 EV chargers will be pre-programmed to respond to the CPUC’s electrification-friendly rates.

GRID does not recommend a separate adder to solicit DR participation because there are CPUC jurisdictional programs that manage household-level DR participation (e.g. Emergency Load Response Program). All households that utilize bi-directional EV charger technology will automatically be capable of participating in DR programming.

Lastly, GRID recommends the rebate adder approach, instead of a more technology-inclusive and higher rebate value, because we recognize not all EVs are equipped with on-board inverters capable of handling bi-directional import/export capabilities. This structure ensures rebate assistance is based on household-specific needs while keeping the average rebate amount lower.

4. **How can we best account for differences in regional housing electrification needs within this state-wide incentive?**

GRID has observed that panel replacement costs vary considerably depending on the demand for services of local contractors and/or the proximity of available contractors to serve specific markets. Similarly, GRID has observed it is common for older homes to have 100-amp or 150-amp service panels which require panel replacements to accommodate increased electricity consumption.

To account for regional cost, proximity, and/or electrical system differences, GRID recommends the CEC adopt a flexible approach in setting a rebate level to ensure all households can benefit from incentives designed to overcome specific households' needs.

Thank you for the opportunity to provide input on this much-needed equity program. We look forward to collaborating with the CEC to ensure that low-income Californians have streamlined and equitable access to household electric vehicle charging infrastructure.

Respectfully submitted,

Steve Campbell
Policy Director, West
GRID Alternatives