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The Partnership & 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:

The California Housing Partnership (Partnership) and GRID Alternatives (GRID) respectfully submit the following comments in support of the California Energy Commission's (CEC) proposed funding concept to ensure low-income multi-family tenants have reliable, accessible, and affordable solutions to charge electric vehicles (EVs). The Partnership is a state-created private nonprofit organization whose mission is to create and preserve affordable and sustainable homes for Californians with low incomes by providing expert financial and policy solutions to nonprofit and public partners. The Partnership has more than three decades of experience helping nonprofit and local government housing agencies navigate multiple complex statutory, regulatory, and code requirements to ensure affordable housing developments across California can be financed, constructed, and operated in a safe, sustainable, and affordable way for tenants.

GRID is a mission-based, direct service provider that builds community-powered solutions to advance economic and environmental justice through renewable energy. GRID serves as the statewide administrator for the California Air Resources Board (CARB) Access Clean California Program which provides streamlined access to California's electric vehicle (EV) equity incentives, coordinated statewide outreach, and centralized income verification. GRID also serves as the third-party administrator for PG&E's Empower EV low-income charging program; as a statewide implementation partner with Beneficial State Foundation for their CARB-funded

Clean Vehicle Assistance Program; as a regional implementation partner for the Bay Area Air Quality Management District's CARB-funded Clean Cars 4 All; as a regional implementation partner with Community Housing Development Corporation for their CARB-funded Driving Clean Assistance Program; as a statewide administration partner with Center for Sustainable Energy for the California Energy Commission (CEC) CALeVIP 2.0 light duty charging program; and as a statewide administration partner with CALSTART for the CEC Communities in Charge light-duty charging program.

From these decades of experience, GRID and the Partnership recognize that multi-family affordable rental housing providers and tenants will have a more difficult time depending on using electricity as fuel due to increases in cost and complexity of technologies and pricing. We are nonetheless committed to helping design flexible programs to overcome site-specific barriers and to ensuring that the programs support the long-term sustainability of both the state’s precious stock of affordable rental properties and the low-income households who call these properties home.

We organize our comments in response to the questions outlined in the Funding Allocations for Light-Duty Passenger Electric Vehicle Charging Applications workshop on 26 January 2023.

Charging at Affordable Multi-Family Households

GRID and the Partnership strongly support programming that directly assists in clearing barriers on each side of the split incentive scenario. For multi-family affordable housing providers, clean energy-related technical assistance (TA) is generally required to help ensure that energy programs can be successfully utilized in these complex and economically fragile properties. Program implementers should understand that housing providers’ top priority has to be to meet all existing non-energy-related regulations and requirements to continue providing safe and affordable housing to their tenants in an economically feasible manner. At the same time, low-income tenants' top priority is to preserve their assets so that they can meet their basic needs. As a consequence, they are unlikely to invest in EVs if charging at or near their complex is difficult, time-consuming, expensive, and/or inconvenient. This proposed block grant approach will need to carefully consider the houser and tenant user experience in order to design a successful program. GRID/the Partnership offers the following responses to the questions below.

1. **Should the solicitation include DC fast chargers?**

No. It is important to recognize that many multi-family properties carefully and intentionally limit parking on-site due to cost constraints and emission reduction goals such as incentivizing access to public transit. As a result, many such properties do not provide a parking space for each tenant. In this scenario, direct current fast chargers (DCFCs) may not be a strategic use of limited funding.

2. Should projects only include sites that are classified as both multi-family housing and affordable housing?

Yes. It is well documented that low-income renters and affordable housing tenants generally face the greatest number of barriers to adopting EVs. For this reason, we recommend that limited state funding to incentivize EV charging be proportionately disbursed based on the number of barriers needed to be removed. Due to limited rental income and strict regulations and third-party rights governing net income, non-profit affordable housing providers generally do not have money available to pay for EV charging. As such, non-profit affordable housing properties governed by federal and state regulatory agreements will need significantly more financial assistance to install EV chargers compared to multi-family developments that house higher-income residents. Similarly, we recommend that block grant funding be reserved for non-profit affordable housers instead of allowing for-profit developers to access limited state funding. Given that affordable rental housing represents more than 30% of the state's new multifamily rental production and funding is not dedicated to affordable housing, a large portion of the state's rental housing stock will not be served and EV adoption will continue to have equity gaps.[1]

3. **Recommended process for verifying affordable housing status?**

We recommend verifying affordable housing status through an affordability deed restriction imposed by the State of California or an affordability contract monitored and enforced by the federal government. This is a standard document that affordable housing complexes have and is used by other state affordable housing programs, and is a clear and effective way to ensure that affordability is maintained for a development. Additionally, allowing eligibility in other income-qualified programs to create a categorical eligibility pathway for this block grant is a good way to leverage multiple funding sources. For example, if a development is eligible for programs like the Low Income Weatherization Program (LIWP) or Solar on Multifamily Affordable Housing (SOMAH), they should be automatically eligible for this program.

4. **What are ways to make this concept more equitable?**

This funding concept can be made more equitable by starting with providing no-cost technical assistance to nonprofit-controlled affordable housing properties to explore different options for EV infrastructure deployment. All relevant clean energy program investments should be co-marketed and utilized during this period.

As mentioned in response to question 3, many multi-family affordable deed-restricted rental properties have already participated in or learned about existing and complimentary clean energy programs, such as the SOMAH program. From the perspective of alleviating net peak demand, it

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[1] California Housing Partnership Housing Needs Dashboard

will be advantageous to leverage on-site solar (and co-located storage) programs so local generation can be utilized as electricity to power local EV demand. Moreover, incorporating on-site generation can also offset ongoing charging costs, ideally ensuring long-term affordable charging rates for tenants' power by local clean electricity. Without this pairing, it is possible that resident utility costs would increase resulting in higher energy burdens.

To the extent possible, installations should incorporate workforce development opportunities for tenants, and prioritize BIPOC-owned, woman/non-binary-owned, returning citizen-owned, and/or veteran-owned residential electrical companies.

We also recommend customized community outreach to tenants to access available EV incentive programs to utilize vehicles that can use this infrastructure. Accordingly, we strongly recommend increasing the 10% maximum allowable costs for engagement and outreach from other multifamily programs like REACH 1.0 to allow for deeper tenant engagement for affordable multi-family tenants who will have less prior exposure to EVs. We also support engagement models that utilize pass-through dollars for trusted CBOs. Nonprofit-controlled property owners should also be supported in exploring and deploying shared e-mobility solutions like EV car-sharing programs that can be used by all tenants.

GRID and the Partnership look forward to continuing our collaborative approach to ensure this block grant can be designed in a manner that strategically, efficiently, and effectively serves income-limited tenants across California.

Respectfully submitted,

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