

**DOCKETED**

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*Comment Received From: Gladstein, Neandross Associates*  
*Submitted On: 2/17/2023*  
*Docket Number: 20-TRAN-04*

**CHILL-2 Comment Letter**

*Additional submitted attachment is included below.*

February 17, 2023

Mark Wenzel, Branch Manager, Light-Duty and Electric Vehicle Infrastructure  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

**Re: Comments on Convenient, High-Visibility, Low-Cost Level-2 Charging (CHILL-2) Grant Program**

Dear Mr. Wenzel,

On behalf of Gladstein, Neandross & Associates (GNA), we thank you for the opportunity to submit comments on the in-development CHILL-2 grant program. For the past thirty (30) years, GNA has successfully developed and implemented projects on behalf of our clients that reduce emissions and fuel costs, improve air pollution, and secure funding for alternative fuel, advanced vehicles, and fueling/charging infrastructure deployments. We have helped our clients secure over \$1 billion in funding to assist in the transition of their fleets to zero-emission vehicles (ZEV). Our clients come from varying backgrounds and industries such as the public sector (Port of Los Angeles; California Air Resource Board; Los Angeles County Internal Services Department), vehicle and equipment operators (Albertsons; Penske Truck Leasing Co.; CR&R Waste and Recycling), and fuel suppliers (EV Connect; Southern California Edison; WattEV). We are excited by the current positive energy towards realizing a cleaner transportation future.

We respectfully submit the below comments indicating areas of improvement for the upcoming CHILL-2 grant program that we believe will maximize its impact:

1. **California Energy Commission (CEC) should expand the charger installation radius from less than 1.5 miles to less than two (2) miles.** GNA supports the CEC's goal to increase the perception of Level 2 chargers in California through the deployment of chargers in highly visible, dense locations. As battery-electric vehicles (BEVs) are set to become a more prominent part of life in California in the upcoming years, it is important that the general population become more comfortable with charging infrastructure. This is accomplished by placing chargers in locations where citizens can see and interact with them. While we support the goal of the CHILL-2 grant program, we recommend increasing the radius from less than 1.5 miles to less than two (2) miles. This will better facilitate the deployment of Level 2 chargers, while allowing for the benefits to be better felt in disadvantaged and low-income communities.
2. **CEC should refrain from imposing unnecessary restrictions on parking spaces with CHILL-2 funded chargers.** Adoption of BEVs in California continues to increase at a rapid pace with almost 150,000 BEVs purchased in 2021 alone. While it is vital to deploy the necessary charging infrastructure to serve the ever-increasing number of BEVs in the state of California, it is worth noting that per the CEC's website, as of the end of 2021, BEVs make up only 1.745% of light-duty vehicles within the state. Converting valuable parking spaces located in dense areas to be exclusively for BEV charging will remove valuable parking spaces that will not be fully utilized for several years until BEVs make up a higher percentage of vehicles in California. Such strict requirements will hinder the private sectors engagement with the CHILL-2 solicitation. Due to the lack of parking spaces in dense urban environments, we recommend that parking spaces with CHILL-2 funded chargers be seen as long-term investments providing the necessary infrastructure required for BEVs, rather than restricting parking spaces to solely be used for BEVs.

Please do not hesitate to reach out to GNA's Senior Vice President of Programs & GNA Partner, JoAnne Golden ([joanne.golden@gladstein.org](mailto:joanne.golden@gladstein.org)) as you move throughout this process.

Thank you in advance for your consideration, and we look forward to continuing to engage with you throughout the development of CHILL-2.

Sincerely,

A handwritten signature in cursive script, appearing to read "JoAnne Golden", written in dark ink on a light background.

JoAnne Golden  
Senior Vice President, Programs & GNA Partner  
Gladstein, Neandross & Associates  
[joanne.golden@gladstein.org](mailto:joanne.golden@gladstein.org)