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**EVgo Comments on Funding Allocations for Light-Duty Passenger
EV Charging Projects**

Additional submitted attachment is included below.

February 23, 2023

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket No. 20-TRAN-04 Funding Allocations for Light-Duty Passenger Electric Vehicle Charging Projects Presentation – January 26, 2023

I. Introduction

EVgo appreciates the opportunity to submit comments in response to the California Energy Commission’s (CEC) Presentation on Funding Allocations for Light-Duty Passenger Electric Vehicle Charging Projects (Presentation). With more than 850 fast charging locations, EVgo’s owned and operated charging network serves over 68 metropolitan areas across 35 states and more than 500,000 customer accounts. Headquartered in Los Angeles, EVgo’s fast charging network includes hundreds of charging locations in California.

During the Presentation, CEC Staff shared concepts for several forthcoming solicitations for light-duty electric vehicle supply equipment (EVSE) incentive programs as well as other proposed funding concepts for comment. EVgo responds to the CEC’s questions on these concepts in further detail below and also raises ideas for additional solicitation concepts.

The CEC has an unprecedented opportunity to accelerate progress toward the achievement of California’s zero emission vehicle (ZEV) goals, and EVgo looks forward to supporting these efforts through the deployment of convenient, reliable, and affordable charging infrastructure that meets drivers’ and fleets’ evolving needs.

II. Fast and Available Charging for All (FAST)

EVgo strongly supports the upcoming FAST solicitation, which builds upon the CEC’s Charging Access for Reliable On-Demand Transportation Services (CARTS) grant. More convenient, accessible fast charging – particularly in large metro areas – is needed to support the electrification of high-mileage fleets in a manner consistent with the Clean Miles Standard and other ZEV goals. Moreover, modeling from the CEC’s Assembly Bill 2127 Electric Vehicle Charging Infrastructure Assessment (AB 2127 report) finds that transportation network company (TNC) fleets will be well-suited to integrating renewables given their propensity to charge when renewable energy is most abundant in California.¹ Given that FAST supports the electrification of on-demand fleets that complement the state’s renewable energy goals, EVgo encourages the Commission to expand these efforts in the near future, establishing a predictable, regularly occurring FAST solicitation schedule.

EVgo recommends one near-term change for FAST. Notably, unlike CARTs, the Presentation shared that FAST would require public accessibility at eligible sites. *EVgo recommends that FAST be amended to allow dedicated, behind-the-fence and/or hybrid (i.e., public and private) EVSE deployments, consistent*

¹ AB 2127 Report at 46.

with CARTS. The CEC’s previous CARTS funding opportunity permitted the development of hybrid charging sites that support both dedicated chargers for on-demand fleets as well as publicly available chargers for private drivers.² These charging configurations can help ensure that TNC fleets, which are the target of this solicitation, have predictable access to chargers that are necessary for high-mileage operations while increasing safety and public charger availability for non-TNC drivers.

III. Municipal Fleets Solicitation (MFS)

While MFS is focused on city and county fleets, *EVgo encourages CEC to think more broadly about light duty fleets, including private fleets*. While EnergiIZE is largely focused on medium-heavy duty fleets, a complementary program in the light-duty space does not exist. At the same time, the California Air Resources Board’s forthcoming Advanced Clean Fleet (ACF) Regulation will require light-duty fleets to rapidly electrify.

EVgo also encourages the CEC to clarify that fast chargers will be eligible to compete for program funding and serve as a charging solution for fleets that may require higher charging speeds to complete their duty cycles. Additionally, EVgo recommends the CEC develop the MFS as a turnkey solution for fleets, providing resources for ongoing operation and maintenance of chargers to improve station reliability and performance.

IV. Finding Solutions to Local Charging Needs (Finding Solutions)

EVgo broadly supports the goals of Finding Solutions and commends the CEC for considering how charging solutions can best meet local needs – particularly for drivers who may not have regular access to charging at home. As a threshold matter, *EVgo encourages the CEC to clarify if local governments are intended to be the primary applicants for this funding, and if EV chargers deployed as part of this solicitation will still be allowed to be owned and operated by electric charging service providers in a manner consistent with other CEC EVSE incentive programs like CALeVIP.*

1. *Should the scope be narrowed to focus exclusively on a specific approach (like curbside or charging plazas)?*

EVgo does not recommend that curbside charging be a focus of a standalone RFP, as curbside projects are already eligible in other CEC program concepts.

EVgo strongly supports a focus on larger, dedicated fast charging sites (often referred to as plazas or hubs) that can accommodate more charging stalls and drivers, with a focus on higher power (150kW+). Other states – such as Colorado – have begun to implement regular Plazas programs. Larger charging hubs not only increase the reliability and redundancy of a given site but can also increase consumer confidence in EV charging infrastructure and support EV charging needs of new, mainstream EV drivers that may be less likely to have access to home charging as early EV adopters, as well as fleet drivers. To this end, EVgo recommends that this solicitation also allow for the development of dedicated, private and/or hybrid EVSE deployments in line with the recommendations above for the FAST solicitation. EVgo seeks clarification as to how the plazas under this program may differ from FAST.

² <https://www.evgo.com/press-release/evgo-selected-by-california-energy-commission-two-regional-project-proposed-awards-support-ca-rideshare-electrification/>

V. Grid-Light and Resilient Charging (Grid-Light)

1. *How should “grid-light” be measured and should a maximum level of grid reliance be specified? (For example: The grid connection for charging cannot exceed 30 percent of total charging capacity.)*

EVgo asserts that a maximum level of grid reliance should not be specified at this time for Grid-Light. Fast charging co-located with distributed energy resources (DERs) like battery storage is relatively nascent. Rather than artificially prescribing a maximum level of grid reliance, the CEC could instead weigh lower levels of grid reliance more favorably in the solicitation – among other cost and performance criteria.

VI. Serving Electric Range for Vehicle Electrification (SERVE)

EVgo is interested in CEC’s SERVE concept and appreciates the open nature of the program proposal. That said, EVgo looks forward to more program details on how eligible projects can best support CEC’s charger utilization and cost objectives.

CEC should also consider adopting a \$/kW evaluation metric, which supports cost efficiency and development of projects that can achieve higher energy throughput that lead to greater electric vehicle miles traveled. This approach helps ensure that CEC funds are being spent most efficiently to enable greater access to fast charging options and has been used in other EVSE funding programs. For example, the Bay Area Air Quality Management District’s (BAAQMD) administration of VW Settlement Appendix D funding included this metric in its evaluation criteria and successfully led to the deployment of chargers ranging from Level 2 to 350 kW fast chargers.³ BAAQMD’s program is particularly effective because it provides awards to a variety of business models and charger types, all while promoting cost efficiency.

VII. Charging at Multi-Family Affordable Housing Sites

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

Yes, this solicitation should include DC fast chargers. The CEC has successfully launched the Reliable, Equitable, and Accessible Charging for multi-family Housing (REACH) program which has begun to support the deployment of more fast charging stations near multi-family housing (MFH).⁴ EVgo encourages the CEC to continue to provide flexibility for meeting MFH charging needs in its funding solicitations, as not all priority MFH locations will be able to deploy charging options on-site.

CEC also proposes that projects be within a quarter mile of an affordable, multi-family housing site. EVgo recommends that for eligible fast charging projects, CEC adopt the distance requirements that were established in REACH, which stipulated that DC fast chargers must be located within 5 miles of an eligible MFH site.⁵

³ Light Duty Electric Vehicle Infrastructure 2021 Funding Opportunity, California VW Mitigation Trust (July 2021). Available at <https://www.californiavwtrust.org/wp-content/uploads/CAVW-Trust-QA-72021.pdf>.

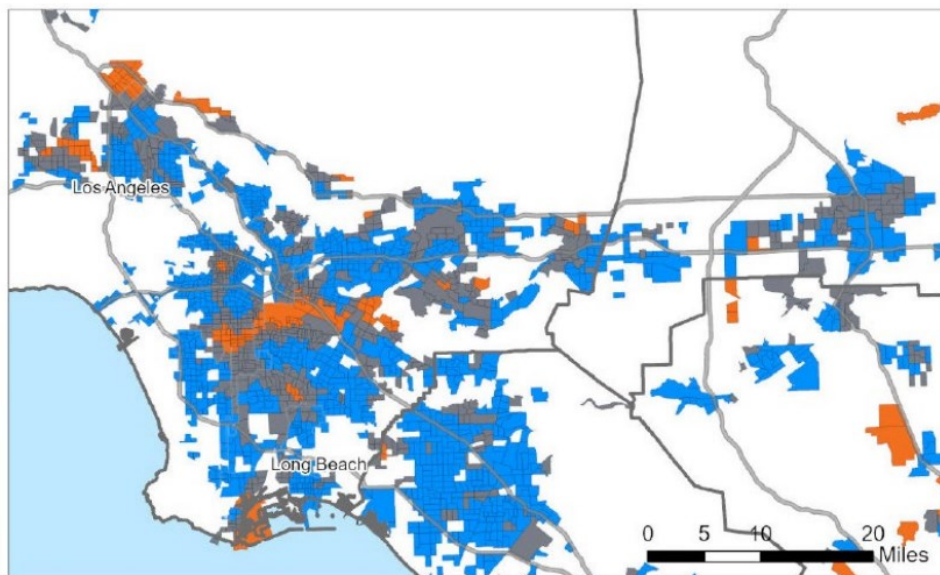
⁴ <https://www.evgo.com/press-release/evgo-selected-by-california-energy-commission-for-proposed-awards-of-3-6m-in-grant-funding-to-build-more-fast-charging-infrastructure-for-multi-family-housing-residents/>

⁵ https://www.energy.ca.gov/sites/default/files/2021-12/GFO-21-603_Pre-App_Workshop_PowerPoint_ADA.pdf

VIII. Reducing Driving Times to DC Fast Charging

1. *Are there metrics other than drive time and cost that CEC staff should consider to improve access?*

Yes. It is important for the CEC to recognize that while funding is helpful in alleviating barriers to fast charger deployment, there are other systemic issues that impede access to fast chargers, including the local permit review processes, restrictive zoning requirements, and delays in energization timelines that limit charging deployments and have equity implications. This is seen acutely in Los Angeles in Los Angeles Department of Water and Power (LADWP) territory, for example, which was highlighted in CEC's Presentation. Directing grant funding to these regions alone will not resolve these issues, and we encourage CEC to take a leadership role in addressing these barriers to access in the forthcoming Integrated Energy Policy Report process, which will focus on accelerating the deployment of clean energy technologies, including EVSE.



Source: CEC Report, 2022 Senate Bill 1000 California Electric Vehicle Infrastructure Deployment Assessment: Drive Times to Direct-Current Fast Chargers

2. *Disadvantaged communities would be better served by which of the following EV fast charging options? Larger Charging Plazas, Smaller Charging Stations, or a mixed approach?*

Without a formal distinction between larger charging plazas and smaller charging stations, EVgo encourages the CEC to preserve flexibility for EV charging service providers to propose solutions that most effectively meet community needs while managing costs. At the same time, EVgo encourages the development of charging sites that can, at a minimum, serve at least four stalls to ensure that drivers have reasonable access to charging at a given site.

3. *What is an appropriate minimum for power output of DC fast chargers?*

At a minimum, EVgo recommends the CEC require DC fast chargers to be capable of providing 150+ kW, consistent with CALeVIP 2.0 hardware requirements and National Electric Vehicle Infrastructure program requirements.

IX. Charging Innovation & Customer Experience

EVgo commends the CEC's leadership in developing innovative EVSE funding opportunities that support California's transportation electrification goals. Beyond solicitations that increase the number of chargers in the state, *EVgo encourages the CEC to use the Clean Transportation Program as a catalyst to drive forward the market transformation necessary to bolster consumer confidence in EVs.* Specifically, the CEC can build off previous ViGIL⁶ and VOLTS⁷ solicitations and support innovative concepts that enhance customer experience, improve charger reliability, and more.

X. Zoning & Permitting Considerations

As CEC continues to explore innovative solicitation concepts, such as charging plazas and other similar large-scale installations, EVgo encourages the CEC to be mindful of local zoning laws and practices. Notably, local jurisdictions that deem EV charging as an acceptable "primary use" will be best-positioned to support large charging plazas. Zoning may be a barrier in other jurisdictions where such a designation has not yet been adopted. CEC can use its unique position to amplify these issues with an eye toward troubleshooting some of these implementation challenges so that the benefits of transportation electrification are experienced equitably across the state, and so that local zoning is not a barrier to site development. *The CEC could encourage cities to adopt zoning and permitting best practices to ensure effective, timely EVSE deployment.*

XI. Conclusion

EVgo appreciates the opportunity to submit these comments and looks forward to supporting the achievement of CEC's transportation electrification goals.

Respectfully submitted this 23rd day of February,

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⁶ <https://www.empowerinnovation.net/en/custom/funding/view/23045>

⁷ <https://www.energy.ca.gov/solicitations/2021-09/rfp-21-601-vehicle-interoperability-testing-symposium-volts>