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**EVCA Comments on Funding Allocations for Light-Duty Passenger
Electric Vehicle Charging Projects Workshop**

Additional submitted attachment is included below.



February 24, 2023
California Energy Commission
715 P Street
Sacramento, CA 95814

Subject: EVCA Comments on Funding Allocations for Light-Duty Passenger Electric Vehicle Charging Projects Workshop

The Electric Vehicle Charging Association (EVCA) appreciates the opportunity to submit comments on the Funding Allocations for Light-Duty Passenger Electric Vehicle Charging Projects Workshop held on January 26, 2023.

EVCA is a not-for-profit trade organization of 20 leading EV charging industry member companies and two zero-emission autonomous fleet operators. The association was established in 2015 to comprehensively represent the entire EV charging value chain and provide a collective voice for decision-makers in California.

The CEC incentive programs are key to accelerate progress toward the achievement of California's zero-emission vehicle (ZEV) goals. EVCA strongly supports the funding priorities of installing chargers and related infrastructure for light-duty electric vehicles in the following areas:

- Block grants for installing chargers for single-family homes.
- Charger installations for multi-family, affordable housing sites.
- Charger installations for new multi-family sites.
- Charger installations for light-duty fleets.
- Charger installations in low-income and disadvantaged communities to reduce drive time to charger access.
- Curbside DC fast charger and Level 2 charger installations.
- Charging stations for the electrification of high-mileage fleets in a manner consistent with the Clean Miles Standard and other ZEV goals.

Regarding the proposed SERVE program, EVCA strongly supports CEC efforts to help capture deployment types that may not fit into existing CEC solicitations. Evaluation metrics can focus on cost-effectiveness and contribution to achieving charging coverage throughout the state and availability for all communities. This should include an economic analysis of each use case. EVCA is interested in learning

more about the SERVE concept and the development of charging solutions that optimize charger utilization while providing an incremental electric range for high-mileage EVs.

Regarding goals for low-income single-family residents, in addition to direct incentives, CEC should look into coupling support for charging installations into incentives and loan assistance for purchases and renting of electric vehicles.

Regarding goals for charging at multi-family housing (MFH) sites, EVCA strongly supports the prioritization of incentives for charging infrastructure for multi-family and affordable housing sites. Providing at-home charging availability at multi-family houses is critical to the widespread adoption of EVs. To that effect, we strongly support that this solicitation includes DC Fast chargers. Furthermore, for permitting and other purposes, we encourage the CEC to allow the inclusion of chargers that can be in convenient sites in very close proximity to MFH sites. "Very close proximity" should be further defined.

Regarding Fast and Available Charging for All (FAST), EVCA strongly supports the upcoming FAST solicitation, which builds on the CEC's existing 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, gig-economy drivers, and car renters, in a manner consistent with the Clean Miles Standard and other ZEV goals.

EVCA strongly supports curbside charging. 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 available real estate. Level 2 curbside stations can serve as a "home-adjacent" overnight charging solution. Therefore, we strongly support the CEC in creating a dedicated rebate funding program for curbside chargers, including level 2 stations.

EVCA appreciates the opportunity to comment on the Funding Allocations for Light-Duty Passenger Electric Vehicle Charging Projects Workshop.

Thank you for your consideration.

Sincerely,

Reed Addis
Governmental Affairs
Electric Vehicle Charging Association