

DOCKETED

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**EVCA Comments on EV Infrastructure Project Tracker Workshop -
July 19 2023**

Additional submitted attachment is included below.



August 8, 2023

Hannon Rasool, Director
Fuels and Transportation Division
California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Comments on July 19, 2023 Electric Vehicle Infrastructure Project Tracker Workshop (Docket No. 23-TRAN-02)

Dear Mr. Rasool,

The Electric Vehicle Charging Association (EVCA) appreciates the opportunity to submit comments on the California Energy Commission's (CEC) Electric Vehicle (EV) Infrastructure Project Tracker Workshop from Wednesday, July 19th. Identifying trends in planning, permitting, construction, and energization are invaluable for understanding and mitigating barriers to the timely deployment of EV charging infrastructure.

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 industry voice for decision makers.

EVCA understands the adverse impact that delays in planning, permitting, construction, and energization processes can have on the progress of EV charging infrastructure projects. Given the rising sales of ZEVs within the state and associated deployment of EV charging infrastructure, EVCA supports the CEC's initiative to establish a statewide database for monitoring the advancement of EV charging projects across various phases and developing a more comprehensive understanding of deployment delays.

EVCA has formulated the following suggestions for the CEC's EV Infrastructure Project Tracker based on the recent workshop:

1. Aggregate and anonymize data on the proposed web dashboard at the Authority Having Jurisdiction (AHJ) level

EVCA supports displaying AHJ-level data on the web dashboard because presenting data at an aggregated level offers the most clear and informative view for the public to better identify delays that can then inform legislation and policy initiatives. Conversely, providing data on an individual project level demands excessive data reporting without significant public benefit, and the granular data is unlikely to offer an overarching view of industry bottlenecks to streamline the EVSE installation process.

EVCA also strongly recommends that CEC anonymize data presented on the web dashboard. Utilizing aggregated and anonymized data will enable the CEC to construct a database that is user-friendly and understandable for state agencies and stakeholders alike. Displaying data at a more granular level on a per-project basis may unnecessarily disclose sensitive business information and impede an accurate assessment of project delays.

2. Differentiate between DC Fast Charging (DCFC) and Level 2 (L2) EV charging projects in the CEC's proposed database and web dashboard

DCFC projects and L2 projects exhibit distinct differences in terms of complexity and permitting timelines. Consequently, segregating projects based on their type offers stakeholders enhanced clarity regarding potential permitting delays. When DCFC projects are combined into an averaged with L2 projects on a public-facing web dashboard, it could obscure specific permitting issues or delays that AHJs encounter with DCFC or L2 projects. By maintaining separate categorizations, stakeholders can gain valuable insights into the unique challenges and bottlenecks that may arise during the permitting process for DCFC or L2 installations, ensuring a more accurate representation and targeted resolution of any issues.

For example, DCFC projects typically occupy more substantial spaces (i.e., larger lots and power equipment) compared to L2 projects. The presence of additional equipment and larger dispensers often results in the activation of screening requirements and other code mandates, necessitating a thorough site plan review. Moreover, meeting landscaping standards for these larger charging hubs can prove challenging, especially when considering the intricate utility work and underground wiring involved in DCFC projects. As a result, these larger DCFC sites are often subject to more detailed review and longer permitting timelines as applicants seek alternative means of compliance from the AHJ.

3. Require bi-annual, targeted data reporting

EVCA recommends that the following data be submitted bi-annually:

- AHJ permit submittal date.
- AHJ permit approval/denial date.
- Utility application submittal date.
- Utility final design date.
- Developer construction start and complete dates.
- Utility construction start and complete dates.
- Energization date.
- Reasons for permit denial or other project non-completion.

Opting for a bi-annual update of the database offers lead applicants ample time to collect and present data to the CEC. This approach is particularly valuable when conveying averages for projects that span more than three months in duration. Given that EV charging infrastructure construction projects frequently extend to a year or more without regular updates within the initial three months, a bi-annual database update makes the most sense to capture most milestones in the process. To the extent possible, EVCA also supports automated data collection for the CEC's Tracker Tool database to minimize administrative burden for stakeholders.

EVCA supports policies that incentivize the streamlining of permit processes by AHJs and their alignment with California's electric vehicle infrastructure deployment goals. For example, EVCA supports AB 1176 (Zbur), which seeks to mandate cities and counties to integrate transportation electrification plans with clear goals, objectives, and feasible implementation measures into their general plans. Similarly, EVCA fully supports SB 410 (Becker), which calls for the California Public Utilities Commission to establish average and maximum target energization periods. These initiatives underscore the significance of the CEC's Tracker in developing a comprehensive understanding of infrastructure delays, leading to informed and effective solutions¹.

EVCA thanks the CEC for their leadership in supporting the deployment of EV charging infrastructure throughout the state, and we appreciate the chance to offer feedback on this important topic. We look forward to being a resource and supporting the agency's efforts in creating a convenient and dependable charging network accessible to all Californians.

Sincerely,

Reed Addis
Governmental Affairs
Electric Vehicle Charging Association

¹In some states they have enacted stronger measures that would require any prohibition of the installation of charging infrastructure to undergo judicial review, HB23-1233 (Winter), https://leg.colorado.gov/sites/default/files/2023a_1233_signed.pdf.