

DOCKETED

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Curbside Charging is a Critical Solution for Multi-Family Housing

Additional submitted attachment is included below.

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October 17th, 2023

Ms. Patricia Monahan
Commissioner, Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Docket: 19-AB-2127

Re: Curbside Charging is a Critical Solution for Multi-Family Housing

Dear Commissioner Monahan,

Thank you for the release of the draft Second AB 2127 (Chapter 365, Statutes of 2018) Assessment (Assessment) for electric vehicle (EV) charging infrastructure. We are keenly interested in seeing the state's progress in meeting its EV adoption and EV charging deployment goals. Your agency is instrumental in this process and the Assessment is an important tool to ensure the state makes EV charging increasingly accessible, reliable, and convenient for drivers.

We strongly support the Assessment's acknowledgement of curbside charging as a critical tool to increase access to overnight charging, especially for drivers living in nearby multi-family housing. We offer for your consideration suggestions on how to help further accelerate curbside charging deployment in the state.

First, we strongly support the staff recommendation that the next Assessment include an analysis of existing and potential curbside charging by income level, population density, and geographical area¹. Together with the California Energy Commission's (CEC) SB 1000 (Chapter 368, Statutes of 2018) Report, which assesses the geographic distribution and density of chargers by income level and population density, such an analysis could inform local governments on the potential benefits of curbside charging for their residents lacking sufficient charging access. We encourage your agency to consider different types of curbside charging – both Level 2 and direct-current fast chargers (DCFC) – and whether stand-alone Level 2 curbside chargers or those mounted on utility poles, light poles, or other infrastructure are a cost-effective, equitable, and efficient way to achieve such access. Each application has important cost and accessibility implications both for local governments (if they choose to own the chargers) and drivers.

Second, we encourage your agency to collaborate with the Governor's Office of Business and Economic Development (GO-Biz) to develop tools to support local governments' ability to plan for curbside charging more proactively. Many local entities do not have the resources or technical expertise to do this work on their own. Since curbside chargers would be installed in the public right-of-way, there are different permitting, zoning, or local ordinance considerations. They could benefit greatly from state support on model permitting rules, zoning laws, and other ordinances that they could adapt for their

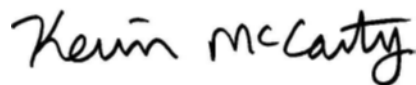
¹ Page 33 of the Second AB 2127 Assessment.

jurisdiction's use – similar to the work GO-Biz has done for EV charging permitting broadly to accelerate implementation of Assembly Bill 1236 (Chapter 598, Statutes of 2015).

Third, we encourage your agency to research the efficacy of existing curbside charging deployments in the U.S. to better understand utilization, driver charging patterns, and driver feedback on their charging experiences, especially ridesharing drivers. Such critical data could have important implications for the overall return on investment for these types of projects as well as provide more insight into the equity benefits. For example, multiple studies on ridesharing drivers in New York City,² Columbus, Ohio,³ and Los Angeles⁴ indicate that if they have access to overnight charging (curbside or otherwise), demand for public DCFCs decreases significantly.

We look forward to hearing from you on these recommendations and are excited to partner with your agency to accelerate curbside charging deployment across the state. Thank you for your consideration.

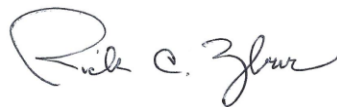
Sincerely,



KEVIN McCARTY
Assembly Member, 6th District



CHRISTOPHER M. WARD
Assembly Member, 78th District



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Assembly Member, 51st District

² Moniot et al. Electrifying New York Ride-Hailing Fleets: an examination of the needs for public fast chargers. iScience. April 15, 2022. Page 10.

³ Moniot et al. Feasibility Analysis of Taxi Fleet Electrification Using 4.9 Million Miles of Real-World Driving Data. National Renewable Energy Laboratory. April 2019. Page 10.

⁴ Schroeder, John et al. EV Charging for All: How Electrifying Ride-hailing Can Spur Investment in a More Equitable EV Charging Network. RMI. 2021. Page 8.