DOCKETED	
Docket Number:	23-ALT-01
Project Title:	2023-2024 Investment Plan Update for the Clean Transportation Program
TN #:	253372
Document Title:	Electrify America Comments on the 2023-2024 Investment Plan Update for the Clean Transportation Program
Description:	N/A
Filer:	System
Organization:	Electrify America
Submitter Role:	Public
Submission Date:	11/29/2023 11:56:13 AM
Docketed Date:	11/29/2023

Comment Received From: Electrify America
Submitted On: 11/29/2023
Docket Number: 23-ALT-01

Electrify America Comments on the 2023-2024 Investment Plan Update for the Clean Transportation Program

Additional submitted attachment is included below.

November 28, 2023

Commissioner Patty Monahan
California Energy Commission
715 P Street
Sacramento, California 95814

RE: Comments on 2023-2024 Clean Transportation Plan Update

Dear Commissioner Monahan:

Electrify America appreciates the opportunity to comment on the 2023 – 2024 Investment Plan Update for the Clean Transportation Program (Investment Plan). Electrify America operates the largest open network of DC fast chargers (DCFC) in the nation, with over 1,100 ultra-fast (150+ kW) chargers across 250 public charging stations in California. The Clean Transportation Program is vital in helping California reduce air pollution and greenhouse gas emissions. Electrify America strongly supports funding to accelerate zero-emission vehicle (ZEV) deployment and thanks the Commission and staff for their work. The following comments are offered to strengthen and support the proposed 2023-2024 Investment Plan.

Prioritize ultra-fast charging

Electrify America is committed to promoting equity and empowering communities to enable access to electric transportation. Investment in ultra-fast chargers, in particular, is an important equity tool. Ultra-fast charging provides a future-proofed charging solution that will best support the State's efforts to reach all drivers and achieve 100% ZEV sales.

While Electrify America appreciates recognition of the need for DCFC in this Investment Plan, we emphasize that the recently-released Draft Second AB 2127 Electric Vehicle Charging Infrastructure Assessment report identifies a growing need for DCFC,[1] including higher levels than previously envisioned in the first AB 2127 report.

Even the increased focus on DCFC in the draft second AB 2127 report likely underestimates the role ultra-fast DCFC should play as a future-proofed solution that maximizes user convenience and supports the broadest array of ZEV drivers and segments. Ultra-fast public charging is ultimately the most effective way to serve EV drivers who live in multi-unit dwellings (MUD) and may not have access to charging at home or work. It is critical to provide charging to these drivers, who may be lower income and more racially diverse than earlier ZEV adopters, in order

[1] https://www.energy.ca.gov/publications/2023/second-assembly-bill-ab-2127-electric-vehicle-charging-infrastructure-assessment

to increase ZEV market share and meet the State's transportation electrification goals. Ultra-fast charging also responds to consumer preferences for faster charging speeds and provides a network aligned with automotive industry trends where new ZEVs are increasingly accommodating faster charging speeds.

Given this, Electrify America encourages the CEC to prioritize investment in high-powered, ultra-fast DCFC charging infrastructure by establishing a minimum charging speed of 150 kW, and by requiring that at least one charger at each station location to be capable of delivering at least 350 kW, for all future, publicly-funded DC charging stations designed to serve light-duty ZEV needs.

Consider charger reliability holistically

Electrify America agrees that a reliable charging experience is critical to support widespread ZEV adoption. Electrify America has made significant investments not only in charging infrastructure, but also in developing an ecosystem of capabilities built to support the reliability of our network. As the CEC implements the Clean Transportation Program, Electrify America suggests that reliability efforts require recipients of state funds to measure reliability not just at the charger level, but also the station level, and for recipients of state funds to demonstrate a broad array of reliability capabilities to support improved charger reliability. For example, along with providing the fastest charge speeds in the industry, Electrify America has implemented the nation's leading interoperability testing laboratory, 24-hour customer assistance, 24/7 technical and diagnostic monitoring through our Network Operations Center, and the industry's most robust technician training program.

Support ongoing funding for light duty DCFC infrastructure and CALeVIP

Light-duty DCFC infrastructure is essential for today's ZEV market and must scale quickly to meet the expanding market for light-duty ZEVs in California. While the federally funded National Electric Vehicle Infrastructure (NEVI) Formula Program will provide significant DCFC charging infrastructure along high-volume interstate highways, ZEV charging closer to (and within) communities is still needed to ensure that all ZEV drivers have access to affordable and reliable charging.

Electrify America appreciates the increasing focus on DCFC infrastructure to serve medium-duty/heavy-duty (MDHD) ZEVs, as those markets begin to grow. However, as the CEC increases its focus on MDHD ZEVs, it should not do so at the expense of the ongoing need to build out a complete, ultra-fast charging network for light-duty ZEVs in the State. Accordingly, Electrify America encourages continued support for light-duty ultra-fast DCFC infrastructure, including through ongoing, committed funding through the CALeVIP program.

Electrify America appreciates the steps the Center for Sustainable Energy and the CEC are taking to monitor and improve program processes for CALeVIP. The incentives provided through CALeVIP 2.0 simplify the funding process and accelerate charger deployment compared

to previous solicitations. Each CALeVIP project provides incentives for the purchase and installation of electric vehicle infrastructure in specific regions throughout the state, with funding targeted at regions that have low rates of infrastructure installation or lack adequate incentives from utilities and other sources. The Clean Transportation Program should continue to support this framework moving forward to ensure the build out of a complete charging network to achieve the State's transportation electrification goals.

Support targeted investments

Finally, as stated above, ultra-fast public DCFC fundamentally supports equity and ZEV market growth. ZEV owners without access to off-street parking or home chargers rely on DCFC as their primary source for charging. Electrify America supports the CEC's efforts to target investments in low income and disadvantaged communities, and is proud that about half of its stations in California serve these communities. Electrify America encourages CEC to continue targeting investments in these communities, as well as others underserved by ZEV infrastructure, to ensure that all Californians have equitable access to ultra-fast DCFC charging.

In addition to low income and disadvantaged communities, CEC should also target investments in other regions where DCFC infrastructure may be lacking, such as rural communities. As noted in the Revised Staff Report, about 88 percent of urban communities are within 10 minutes of a public DC fast charger, but about 60 percent of rural communities are farther than 10 minutes away.

Thank you for the opportunity to comment on the Clean Transportation Program's investments and ongoing work to accelerate the transition to electric vehicles in California.

Sincerely,

/s/

Rhiannon Davis
Director, Government Affairs
Electrify America, LLC