

**DOCKETED**

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<b>Filer:</b>	Igor Tregub
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California Energy Commission  
Docket Unit, MS-4  
Docket No. 20-TRAN-04  
715 P Street  
Sacramento, California 95814

January 19, 2024

Dear California Energy Commission (CEC),

I serve as the chair of the California Democratic Party's Environmental Caucus who advocates for policies that advance access to local distributed energy resources, including Virtual Net Energy Metering (VNEM) and electrical vehicle (EV) charging infrastructure. I write these comments as an individual, but, as a multi-family housing renter in a building that does not have solar or EV charging infrastructure, and who has to drive my plug-in hybrid six blocks to the nearest public charging facility when I'm able only to often find that no spaces are available or operable, I have a major stake in a holistic, inclusive, and effective resolution of the issues raised in this docket.

First, I am writing in comment to the design of *Communities in Charge*, in particular section 2.2:

**2.2. Project Site Eligibility**

*2.2.2 c) All Level 2 [EV Supply Equipment (EVSEs)] must be shared and may not be assigned or otherwise allocated to any one individual.*

This meshes poorly with the VNEM program that allows a single solar array to provide bill credits for multiple residential meters. If chargers are drawn from common area meters, building tenants would have solar credits they have no way to spend to charge their own vehicles.

Where multifamily residents have dedicated parking, a per-spot EV dedicated charging station makes tremendous sense. This most closely replicates the ease of charging enjoyed by single family residences, and allows ready access to whatever usage tiers, income based rate plans, solar credits, or other discounts the tenant may enjoy. The cost of EVSE hardware is a fraction of the value of vehicles: everyone can have their own.

Thus, I encourage the CEC to completely remove Section 2.2.2 c, replacing it with an equal access provision. Grant money should apply to any charger equally available to all EV operating property users.

In addition, I write to point out the potential for price gouging is large in captive markets like multifamily charging. I encourage the CEC to consider rules to limit the markup on electricity that is permitted in such captive situations. While direct tenant meters do not involve a markup, this issue needs to be considered for shared chargers.

Thank you for your consideration.

Respectfully,  
Igor Tregub (as individual)  
Titles for ID purposes only