

DOCKETED	
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Comment for Docket No 20-TRAN-04 – Presentation, Light-Duty Electric Vehicle Block Grant Design Changes Workshop

Additional submitted attachment is included below.



Date: January 18, 2024

California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Docket No. 20-TRAN-04 – Presentation, Light-Duty Electric Vehicle Block Grant Design Changes Workshop

Dear California Energy Commission Program Staff,

The Urban Collaborative Project (UCP) is pleased to provide these comments in response to the January 9th, 2023, Light-Duty Electric Vehicle Block Grant Design Changes Workshop. We value the California Energy Commission's (CEC) solicitation of public input and feedback on proposed changes to the California Electric Vehicle Infrastructure Project (CALeVIP 2.0) and Communities in Charge (CIC) incentive programs. UCP encourages prioritizing rapid development of electric vehicle (EV) charging infrastructure within low-income and disadvantaged communities.

UCP is a community capacity building effort consisting of a series of action teams using data to identify and address major disparities within City of San Diego Council District 4 and the greater Southeast San Diego community. We ensure our community has a voice in major decisions by facilitating resident-stakeholder engagement opportunities through monthly community meetings focusing on health, transportation, housing, and infrastructure. UCP is part of the San Diego Association of Governments (SANDAG) Social Equity Working Group, co-chair of the County of San Diego Central Region Community Leadership team, and co-chair of the San Diego Promise Zone's Housing Affordability Working Group, in addition to working closely other community-based organizations serving disadvantaged communities.

In response to the proposed design changes posed by CEC staff during the Light-Duty Electric Vehicle Block Grant Design Changes Workshop, we offer the following comments and feedback for your consideration:

The removal of stackable funding with any other rebate program:

UCP advises **against** the removal of the ability to stack CIC incentive funding with other rebate programs, including local, state, and federal programs that provide both funding and technical assistance resources. Removing stackable funding will result in a barrier for low-income and disadvantaged communities, which already have limited resources and capital to implement infrastructure projects. Stackable incentive funding ensures equitable access to resources and reduces costs for projects. Currently, CIC does not offer no-cost onsite technical assistance, which essentially leaves behind the communities that do not have the expertise, infrastructure, or resources to implement EV charging projects. Being able to stack other incentives with CIC will have a positive impact on applicants from under-resourced communities by providing them



with equitable opportunities to make EV charging projects a reality through funding *and* technical assistance.

Reduction of the Multi-Family housing adder of \$3,500 to \$1,000:

UCP respectfully requests that the CEC *not alter* the Multi-Family Housing adder from \$3,500 to \$1,000, and instead keep the adder amount at \$3,500. Doing this would hurt affordable housing and deed-restricted low-income housing properties in their ability to install EV charging for tenants though CIC, recognizing that not much funding exists for these projects. We support a compromise option to keep the \$3,500 adder for affordable & deed-restricted housing while lowering the adder for different forms of multi-family housing.

Removal of mid-point payments:

UCP *discourages* the removal of mid-point payments for CIC. Removal of the mid-point payment will result in less upfront capital available to low-income and disadvantaged community applicants. We support maintaining the mid-point payment for awardees to ensure they have the necessary funds to successfully implement EV infrastructure projects.

Proposed changes to the application ranking system, including utilizing a single readiness tier for all applicants and awarding funding based on the rebate amount requested from lowest to highest amount:

UCP advises *against* this proposed change, since it would work against equity and would largely benefit applicants with more resources and lower project costs. Applicants from low-income or disadvantaged communities are likely to have higher project costs due to necessary infrastructure upgrades, and they should not be put at the bottom of the list because of it. Instead, underserved communities should be prioritized in the ranking system.

Increasing the maximum rebate percentage from 75% of eligible costs up to 100%:

Finally, UCP *fully supports* updating the maximum rebate percentage up to 100% of total eligible project costs. This will ensure that projects are complete and fully funded, especially in the communities that need them most.

Thank you in advance for the consideration of UCP's comments on behalf of the communities we serve. If you require any further information, please contact me at bpollard@ucproject.org.

Sincerely,

Brian Pollard
Founder and Executive Director
The Urban Collaborative Project