

**DOCKETED**

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**Southern California Tribal Chairmen's Association Comments on  
Docket No 20-TRAN-04**

*Additional submitted attachment is included below.*



January 19, 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 Southern California Tribal Chairmen's Association (SCTCA) 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. SCTCA's Tribal Energy & Climate Collaborative is supporting the rapid development of electric vehicle (EV) charging infrastructure within the communities of our 25 Member Tribes throughout Southern California.

**Introduction**

SCTCA is a multi-service non-profit corporation established in 1972 for a consortium of 25 federally-recognized Indian tribes in Southern California. The primary mission of SCTCA is to serve the health, welfare, safety, education, cultural, economic and employment needs of tribal members and descendants in the region. SCTCA, in partnership with the Pala Band of Mission Indians, recently launched the Tribal Energy & Energy Climate Collaborative (TECC) program to address clean energy, climate change, and related economic development needs and goals of SCTCA Tribes.

**Comments**

In response to the proposed design changes posed by CEC staff during the workshop, we offer the following comments and feedback for your consideration:

Increasing rebates to cover up to 100% of total eligible project costs (TEPC)

**SCTCA strongly urges CEC to increase the maximum rebate percentage to cover up to 100% of total eligible project costs.** The rebate caps of 75% of TEPC for Communities in Charge and 50% of TEPC for CALeVIP are the biggest barriers to Tribes participating in these programs. For many Tribes, there isn't any funding available in their budgets for EV Charging stations and there won't be funding for the foreseeable future.

It is also a barrier for Tribes if they need to pay for the EV charger project costs upfront and wait months or longer to receive the rebate payments to reimburse these costs. Many Tribes do not have funding available to cover upfront costs. Therefore, it is critical that Tribes have the option to assign rebate payments to a vendor/installer or other appropriate third party. Furthermore, arrangements where vendors and installers cover upfront costs, and then need to satisfy

contract and rebate requirements in order to pay for their equipment and services, will lead to more pre-contract and pre-installation due diligence and, critically, fewer contract change orders that result in increased costs for Tribes after contracts are executed or after construction has commenced.

The removal of stackable funding with any other rebate program:

Unless the rebates are modified to cover up to 100% of the TEPC and the TEPC covers the entire project cost (including design/engineering and installation labor), **SCTCA advises against the removal of the ability to stack CIC incentive funding with other rebate programs, including local, state, and federal programs.** As stated above, a significant number of Tribes will not be able to participate in this rebate program to install EV chargers if they can't secure enough funding to cover the entire cost. If this proposal is accepted, it will put Tribes and DACs with greater need at a greater disadvantage.

Proposed CIC Rural Adder

**SCTCA urges CEC to include a Rural Adder of \$1,000 or more per charger port that can be combined with the Tribal Adder.** SCTCA commends CEC for this proposed change. Rural community charging stations are required for the transition of Tribal members to EVs, due to the distance to resources from the Tribal Reservations that are mostly rural. It would be counter-intuitive to have to rely on charging stations that were an hour away, not in your community to recharge vehicles regularly. Furthermore, costs for products, services, and for projects tend to be higher in rural communities. There is typically less competition to bring down pricing for EV chargers in rural communities, rural customers pay higher prices due to increased travel costs for vendors and installers located closer to urban and suburban areas, and rural customers are more likely to have aged or inadequate infrastructure that needs more costly upgrades to be capable of supporting EV chargers. The Rural Adder on top of the Tribal Adder will ensure that Tribes with the least resources can secure adequate rebate funding (assuming the rebate programs are modified to cover up to 100% of the total project costs) to pay for EV charger installations that will likely be more costly than non-rural, non-Tribal EV charger installations.

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

**SCTCA 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.** Multi-Family Housing properties, particularly existing MFHs (and not new/newer developments), will need these rebates to cover most if not all of the total project cost in order to participate in these programs and install EV charging stations. If this proposal is accepted, it will put Tribal and DAC MFH with greater need at a greater disadvantage.

Removal of mid-point payments:

**SCTCA respectfully discourages the CEC from removing mid-point payments as part of its proposed program design changes.** It would be a hardship for many Tribes to have to wait for reimbursement of costs for EV charger installation projects, and the hardship increases the longer the payments are delayed. If this proposal is accepted, it will put Tribes and DACs with greater need at a greater disadvantage.

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:

**SCTCA discourages CEC from changing the application ranking system as proposed and encourages more favorable ranking for disadvantaged communities that are unlikely to progress projects to a building permit application prior to securing a rebate.** The current ranking system already puts Tribes and DACs with greater need at a greater disadvantage. It requires resources, including money and time, in order to progress a project to the stage of submitting a project to a permit application. As a result, those without adequate resources are being de-prioritized by these programs. The proposal to prioritize applications with lower rebate requests would further disadvantage communities with greater need because these more disadvantaged communities are more likely to require upgrades to customer or utility side infrastructure, or other higher costs, that wouldn't be required at newer facilities in communities with more resources.

### **Conclusion**

It is understandable and commendable that the CEC wants to administer the CIC and CALeVIP programs and their funding more efficiently. However, the Tribes and communities with fewer resources or a greater degree of some other "disadvantage" are going to require proportionally greater support and investment to overcome the challenges inherent in these disadvantages. If the priority is to get these resources to the communities that need it most, these programs will need to 1) provide these communities with enough funding to cover the full cost of EV charging station projects, including infrastructure upgrades and other costs that typically would not be necessary at newer facilities or in better resourced communities, 2) remove barriers to secure rebates for early stage projects, and 3) offer pathways to proceed with reduced risks and no out-of-pocket costs, which can more easily be assumed by vendors and installers.

Thank you in advance for the consideration of SCTCA's comments on behalf of the communities we serve. If you require any further information, please reach out to Joshua Simmons, SCTCA TECC Advisor at [jsimmons@prospersustainably.com](mailto:jsimmons@prospersustainably.com) or 805.617.5685.

Sincerely,



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