

**DOCKETED**

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*Comment Received From: EV Charging for All Coalition and Electric Vehicle Association*

*Submitted On: 1/19/2024*

*Docket Number: 22-EVI-02*

**Five recommended changes to ensure equity and to increase the cost effectiveness of taxpayer-funded EV charging infrastructure**

*Additional submitted attachment is included below.*



California Energy Commission  
715 P Street  
Sacramento, California 95814  
January 17, 2024

Re: Docket No. 22-EVI-02 22-EVI-01 (**Communities in Charge** program)

Dear California Energy Commission:

The [EV Charging for All Coalition](#) (EVCAC) is a broad coalition of nonprofits, companies, individuals and elected officials dedicated to expanding equitable access to EV charging. Our guiding principles are to minimize cost and complexity for residents, builders, and apartment/condo managers, and to bring affordable EV Ready charging to all residents.

EVCAC member [Electric Vehicle Association](#) (EVA) is North America's largest and leading nonprofit that accelerates the adoption of electric vehicles by supporting its 100 chapters and thousands of members as they educate their communities about the benefits of driving electric.

Over the past three years, EVCAC (supported by EVA leaders) has worked closely with the California Department of Housing and Community Development (HCD) and the California Building Standards Commission (CBSC) to ensure that the Title 24, Part 11 CALGreen code supports equitable, cost-effective and sensible access to EV charging for residents of newly built apartments and condos.

In this comment, we:

- a) Identify why and how one of the Energy Commission eligibility requirements for the **Communities in Charge** program has the potential to significantly impede equity for residents of existing apartments and condos, and
- b) Share five policy recommendations to ensure equity and to increase the cost effectiveness of taxpayer-funded EV charging infrastructure deployments. These are based on the Four Components of Equity-Centered Charging for Multi-Family Residents (See the Appendix.)

## A) EQUITY CONSIDERATIONS

The *Communities in Charge* implementation manual, section **2.2. Project Site Eligibility** states:

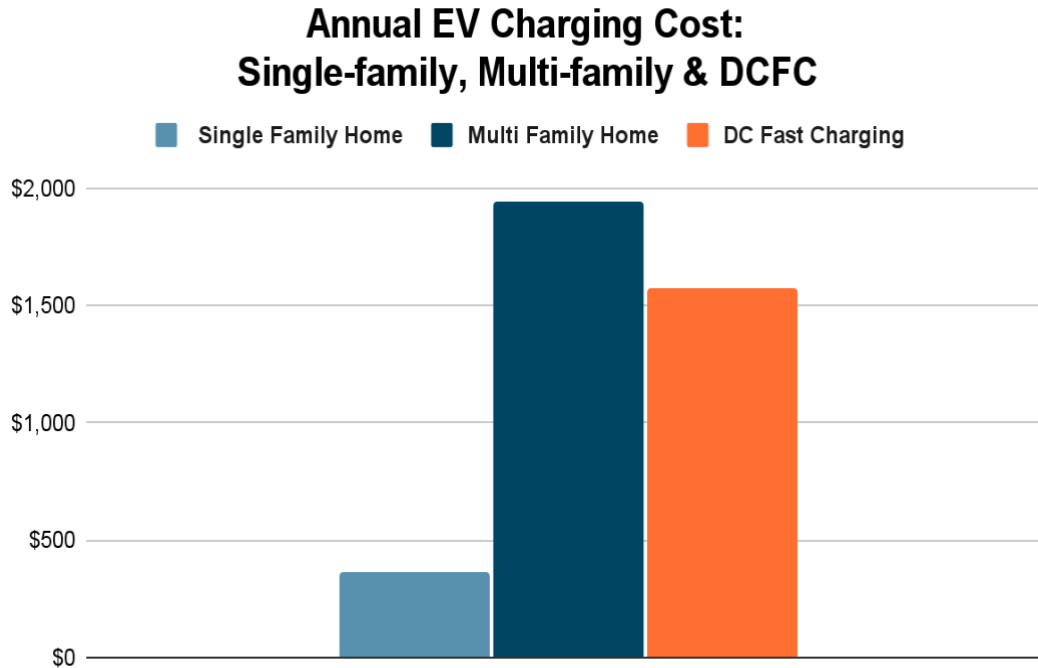
2.2.2 c) All Level 2 EVSEs must be shared and may not be assigned or otherwise allocated to any one individual.

This requirement is **inequitable** for several reasons.

**Subsidizing inequity:** The Energy Commission is likely aware that the CPUC has ruled that the pricing (\$/kWh) of electricity for public charging is unregulated. As a result, residents of multi-family housing (MFH) who use shared (therefore “public”) chargers are rarely able to access **regulated electricity rates for charging**. Instead, they are most often subject to electric pricing levied by **unregulated third-party entities** typically known as Electric Vehicle Service Providers (EVSPs).

EVSPs, as a component of their business model, markup the \$/kWh cost of electricity, and often add additional fees such as connection charges, networking, and idling fees. As a result, the cost to charge at an apartment or condo at a shared charger is not only much higher than the cost to single-family residents, but in some cases **exceeds the cost to charge at a public Direct Current Fast Charging (DCFC) station** (see Figure 1). This is **highly inequitable**, especially given that residents of multi-family housing are disproportionately low income and/or from communities of color.

**Figure 1:**  
**Average annual cost to charge in three scenarios: At a single-family home, at a multi-family home with shared chargers, and at a DCFC public charging station (based on an analysis by Dwight MacCurdy and Diya Kandhra for EVCAC)**



To address these equity issues, the EVCAC recommends these two changes to the Communities in Charge program:

**RECOMMENDATION #1:** Remove Section 2.2.2 c and the shared charger requirement

**RECOMMENDATION #2: Require direct wiring** from each resident's dedicated parking space to their unit's electrical service. This enables multi-family residents to access the same low-cost electric tariffs as single-family residents. It also allows them to benefit from the resiliency provided by bidirectional charging. Note that direct wiring is mandatory for assigned/designated parking in new MFH as part of the Title 24, Part 11 CALGreen Code.

As illustrated by Table 1, requiring shared EV charging infrastructure without direct wiring is particularly egregious for multi-family residents who are also low-income **CARE ratepayers** since they are unable to access special discounted rates for charging that single-family CARE customers can access.

**Table 1:  
How lack of assigned and directly-wiring charging affects CARE customers**

**EV2-A RATE**

The PG&E 30% CARE program discount ONLY qualifies for the EV2-A rate **when the EV circuit is wired directly to the customer's electrical panel.**

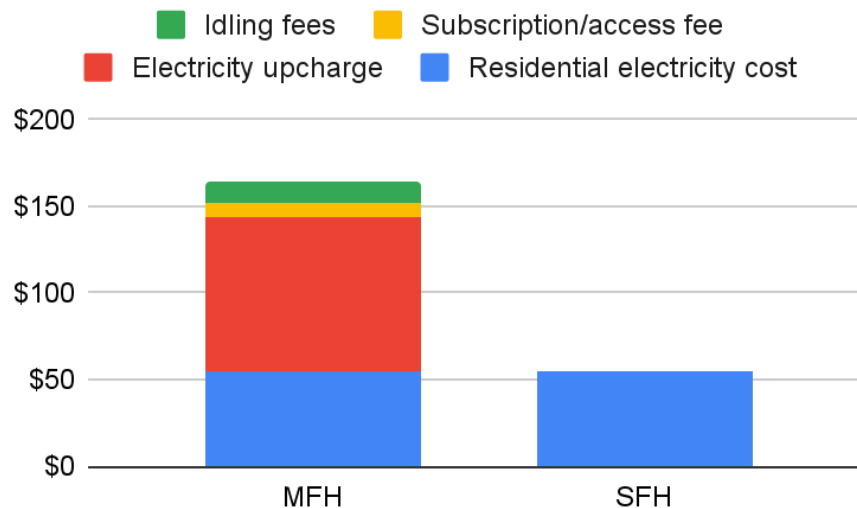
**EV-B SUB-METERED TARIFF**

If they lack direct wiring for charging, residents on PG&E's EV-B rate do NOT qualify for a CARE discount AND they **also must pay an additional \$16/month Basic Service Fee.**

**Enabling owners to profit off residents' lack of individually-assigned chargers:** Many EVSPs market their products to apartment managers by emphasizing the profits they can make from added fees for charging. For example, EVSP ChargePoint's website exhorts, "**Turn your parking spots into profit centers.**" When multi-family residents lack individually assigned, directly-wired EV receptacles, apartment managers and owners often negotiate proprietary contracts with EVSPs; in essence, the cost to charge at these complexes is dependent on monopoly vendors with **no limits on pricing and fees.**

This 2-minute video shows how inconvenient and expensive shared charging can be for residents who must use shared chargers: [bit.ly/EVvideoSJ](https://bit.ly/EVvideoSJ). Figure 2 summarizes the extra costs levied on multi-family residents without individually-assigned and directly-wired charging spaces.

**Figure 2:  
Typical cost to charge at a Multi-family Home (MFH) without direct wiring versus at a Single-family Home (SFH) or a MFH with direct wiring (Based on national data collected by the EV Charging for All Coalition)**



**Ensuring equitable and affordable access to charging:** When multifamily residents have dedicated parking, an individually-assigned/designated EV charging station (receptacle or EVSE) makes tremendous sense. It's the key that gives residents **access to their utility-regulated electricity rate for charging, including discounted rates for CARE residents** that are not available when chargers are shared. It also avoids the musical chairs inherent in shared chargers, and closely replicates the ease of charging enjoyed by single-family residents. The cost of EVSE hardware is a fraction of the value of vehicles: everyone can have, and deserves, their own. Just as single-family residents don't need to share their chargers and parking spaces with their neighbors, multi-family residents shouldn't have to share either.

**B)      WAYS TO REDUCE COSTS WHILE SIMULTANEOUSLY INCREASING ACCESS:  
            Receptacles, Low Power Level 2 and Level 1 Charging**

In addition to the direct wiring detailed above, the EVCAC recommends the following:

**RECOMMENDATION #3:** Allow and encourage the installation of EV receptacles in place of Electric Vehicle Supply Equipment (EVSE). This greatly increases the cost-effectiveness of taxpayer-funded EV charging infrastructure deployment.

**RECOMMENDATION #4:** Allow and encourage EV receptacles to be rated at Low Power Level 2 (208/240 V, 20 A) or Level 1 (120 V, 20 A) rather than full-power Level 2 (208/240 V, 40 A). The value of low-power charging has been recognized by a number of Community Choice Aggregation Energy (CCA) Providers in their EV charging infrastructure grant making. Likewise reducing the power requirements increases cost-effectiveness in deploying taxpayer funded EV charging infrastructure.

**RECOMMENDATION #5: Require adequate** signage at receptacles. Each receptacle should have language indicating that the equipment is for EV charging. For multi-family residents who already drive an EV, this indicates that charging is available. At the same time, it plants the seed of EV acquisition in the mind of the non-EV driver and raises awareness that not all EV charging is done at DCFC stations. The CCA Peninsula Clean Energy suggests specific language and formatting and other associated requirements which we recommend you adopt.

**In sum**, we encourage CEC to make these four changes:

**#1: Remove Section 2.2.2 c and the shared charger requirement.**

**#2: Require direct wiring from each resident's dedicated parking space to their unit's electrical service.**

**#3: Allow and encourage the installation of EV receptacles in place of Electric Vehicle Supply Equipment (EVSE).**

**#4: Allow and encourage EV receptacles to be rated at Low Power Level 2 (208/240 V, 20 A) or Level 1 (120 V, 20 A) not necessarily full-power Level 2 (208/240 V, 40 A).**

**#5: Require adequate signage at each EV charger (receptacle or EVSE).** See above for specifics.

Thank you for your consideration,  
Linda Hutchins-Knowles and Sven Thesen, Co-Leads  
EV Charging for All Coalition

John Higham, Board of Directors  
Electric Vehicle Association



## APPENDIX

# 4 COMPONENTS OF EQUITY-CENTERED CHARGING FOR MULTI-FAMILY RESIDENTS

- 1. Provide each household unit that has parking with at least one EV Ready charging space.**  
This ensure charging access for all residents with parking; doesn't require parking minimum.
- 2. Require at least low-power Level 2 (not full L2) and EV receptacles (not necessarily EVSE).**  
This minimizes cost to builders while providing adequate power and access to residents.
- 3. Wire receptacle or EVSE directly to corresponding household's panel or meter.**  
This allows residents to access utility rates and avoid third-party fees. It requires parking to be **assigned** to specific housing units; this parking can be **unbundled**—paid for separately. Recommend the builder install **quick-disconnect circuitry** to enable re-routing as needed.
- 4. Install prominent signage at each EV Ready space.**  
This ensures awareness of the availability of charging.



Created by Linda Hutchins-Knowles, Co-Lead, EVCAC