

**DOCKETED**

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**FoundationCCC Public Comment for 22-EVI-01 and 22-EVI-02\_01-19-2024**

*Additional submitted attachment is included below.*



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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 Foundation for California Community Colleges (FoundationCCC) appreciates the opportunity to respond to the California Energy Commission's (CEC) solicitation for public input and feedback regarding the January 9th, 2024, Light-Duty Electric Vehicle Block Grant Design Changes Workshop.

In its role as nonprofit auxiliary to the largest system of higher education in the nation, FoundationCCC's work benefits all California Community College students, colleges, college foundations, and the system as a whole by accelerating paths to economic and social mobility, strengthening communities, and reducing barriers to opportunity for all Californians.

For over 17 years, FoundationCCC has developed, implemented, and administered regional and statewide programs related to air quality, clean mobility, and other environmental equity initiatives. Since 2004, FoundationCCC has operated the Smog Check Referee Program and Community Impact Call Center in partnership with the California Bureau of Automotive Repairs (BAR). FoundationCCC also offers several multilingual call centers, and is a hub and trusted source of information for many student and community service programs. FoundationCCC partners with State agencies to support the equitable and efficient administration of benefits to specific populations, including call center administration, payment disbursement, and high-touch support/case management.

California Energy Commission (CEC) activities that FoundationCCC has engaged with include the IDEAL Communities Partnership Project (lead contractor), Communities in Charge (outreach and engagement), and California Electric Vehicle Infrastructure Project 2.0 (outreach and engagement). FoundationCCC implemented peer-to-peer and peer-to-

community outreach programs for all three aforementioned CEC activities through our Student Ambassador Program which empowers California Community College students to support, and advocate for, their own communities in a number of impact areas, including climate action, environmental justice, mental health, food security, Good Jobs, and basic needs access.

Regarding California Electric Vehicle Infrastructure Project 2.0 (Docket Log: 22-EVI-01) and Communities in Charge (Docket Log: 22-EVI-02), FoundationCCC submits the following comments:

### **Expanding and Refining Data Collection for Assessment of Investment Impacts**

The CEC has created highly insightful and impactful data products, including the Zero Emission Vehicle and Infrastructure Statistics dashboards within the Energy Almanac. These data products are only as powerful as the data within them which ultimately depends on the projects and programs collecting said data. For the two programs here (22-EVI-01 & 02), FoundationCCC recommends collecting more data regarding populations served by these investments, especially for private-use charging sites.

One specific recommendation is to collect data on the average and median price for housing units in a property receiving CEC funding, given that 86% of Wave 1 funds went to Multi Family Housing (MFH). Knowing the average and median prices for MFH units empowers the CEC to identify more accurately who is benefitting from the investment of public funds. Additionally, this data can be collected over a period, not just during the application process. Longitudinal data collection enables the CEC to answer questions related to direct and indirect impacts of ZEV charging on local trends, such as MFH unit prices. ZEV charging is often considered an amenity and it is reasonable to assume that offering such an amenity can increase the cost of an MFH unit.

### **Funding Reservation Strategies and Design**

FoundationCCC applauds the CEC and its contractors for their emphasis on an iterative review and assessment of funding reservation strategies and design. We recommend that any substantial changes to these strategies and designs be informed by data and/or piloted in such a way as to minimize negative impacts to historically under-funded communities.

For example, the idea to reserve funding from lowest to highest cost per connector may result in unintended consequences that favor projects with economies of scale and/or lower labor costs. We recommend that the CEC analyze data from past award cycles, including those who were not awarded, to assess what impact, if any, the proposed changes would have had on the dispersal of funding. This assumes that the CEC has the

necessary data to conduct such analyses. Without data to support this, it is recommended that the CEC collect the necessary data in future application waves to enable this type of post-award analysis of the funding dispersal based on various scenarios.

### **Prioritizing Site Types and Supporting a Diverse and Equitable Proliferation of ZEV Infrastructure**

Scoring should consider the different barriers and challenges facing each unique type of site host as opposed to assessing every applicant with a universal rubric that ignores such differences. It is known that unique site types have their own unique needs and challenges. For example, site hosts that are directly regulated by municipal, state, and/or federal entities, such as airports, colleges, and universities, have special review and approval processes that may inhibit an applicant from meeting application deadlines.

Another example is that of access to streamlined permitting. The California Governor's Office of Business and Economic Development (GO-Biz) has created several resources related to ZEV readiness. The GO-Biz scoring of streamlined permitting in municipalities across the state can be used to assess applications more fairly by scoring applications with access to streamlined permitting differently than those without such access.

Scoring designs that consider unique differences based on applicant characteristics are an example of equity whereas universal standards applied to a diverse pool of applicants exemplifies equality. Given that equity is the stated goal of the CEC, there should be an emphasis on equity instead of equality. It is imperative to note the difference since equality-based systems yield to the positive feedback loop of wealth and power accumulation to those who already possess wealth and power. In the case of ZEV infrastructure, this may appear as an increased concentration of funding in areas already served by ZEV infrastructure.