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Comment Received From: Bryce Nesbitt, EV Charging for All Member
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Targetting a population without credit cards - and sensitive to price markups - equitably

Additional submitted attachment is included below.

California Energy Commission
Docket Unit, MS-4 Docket No. 20-TRAN-04
715 P Street
Sacramento, California 95814

March 13th 2024 comments Regarding the *Pre-Solicitation Workshops.*
20-TRAN-04, Community Charging in Urban Areas, *and* Rural Electric Vehicle Charging

When considering DAC/LIC and Rural communities please consider:

- The target populations are particularly sensitive to markups and fees.
- For better or worse, many members of our communities are underbanked and may not have credit/debit cards to operate public chargers.
- Working multiple jobs is common: if EV charging takes extra time, it may not work out.
- Micromobility devices are far more cost effective than full size EVs.

The lowest cost, most time efficient, lowest hassle way to charge a car is to plug and forget, at home. Outfitting apartments with “traditional” EVSEs & panel upgrades can be quite expensive. But it’s not needed. Level 1 outlets are low cost to install, and such chargers have dropped in price (or come with the car). Low power Level 2 is an effective upgrade: a NEMA 6-20 outlet uses the same low cost wire as a regular household outlet. EV load management should be considered first, prior to any panel upgrades.

Home charging also lets lower income persons buy lower capacity EVs or cheap used vehicles with degraded batteries. When you can charge at home: *range is less of an issue, and most can access off peak rates.*

DC fast chargers are an option, but come with high capital costs, hassle & high session and energy fees for users, along with wobbly reliability. For such stations I urge the CEC to rank projects based on site safety and nearby amenities. Rank proposals based on the pizza place, grocery store or restrooms nearby. Rank proposals based on how much they support local businesses and bring shoppers to the *local* economy. DAC/LIC and Rural users may be able to combine shopping with charging, partially addressing the inherent downsides of non-home charging.

Curbside L2 charging has some potential to address the inability of some residents to access home charging.

California Civil Code § 1947.6 (2022) in theory allows multifamily residents to get charging, but in practice it’s ineffective. The owner can insist on conditions that raise the cost, and few renters are willing to invest in equipment that will become the property owner’s property at the end of the rental.

Micromobility charging is important to consider as well. Safe, secure garage parking for e-Bikes and e-Scooters with charging access opens up the potential to shift some DAC/LIC and Rural trips to less expensive vehicles.

And finally free charging, like that from “Adopt a Charger” has value. Yet increased regulation, tracking requirements and process are raising the cost of free charging beyond reach.

In summary I suggest that the CEC:

(1) make apartment per-meter charging eligible using low cost “dumb” chargers
(2) score DC chargers near local shops & restaurants higher
(3) require projects to accommodate micromobility storage and charging
(4) drop some funds into curbside L2 charger experiments
(5) require camera lens on most public fast chargers, so the network operator can detect more cases of blocked/vandalized chargers or components.
(6) allow fully dumb “no network” “free” chargers to continue to be placed, in particular for remote trailheads, parks or other areas where collecting fees is just not worth the cost of collecting the fees.
(7) give extra points to multifamily proposals that include charging options for e-Bikes and e-Scooters (which are really small format EVs).

While implementing the above may look quite different in a grant program, it’s a better fit for the communities you intend to serve.

Bryce Nesbitt 1470 Acton Street Berkeley, CA 94702
Permit Consultant, Commercial Property Inspector
and Multifamily EV charging designer.

Ref: *Kitty Adams Hoksbergen Comments - Adopt a Charger CEC Docket Letter 20-TRAN-04*