

**DOCKETED**

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## **CalETC's Comments on NEVI Program Proposed Second Solicitation**

*Additional submitted attachment is included below.*



March 25, 2024

California Energy Commission  
Re: Docket No. 22-EVI-05

*Submitted via electronic commenting system for docket 22-EVI-05:*  
<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=22-EVI-05>

## **Re: CalETC's Comments on CEC-Caltrans Joint Workshop on NEVI Formula Program Concepts – Second Solicitation**

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the California Energy Commission (CEC) and Caltrans joint workshop on California's National Electric Vehicle Infrastructure (NEVI) Formula Program Concepts for the Second Solicitation held on March 12, 2024. CalETC greatly appreciates Staff's work on the NEVI Program as it is vital to the growth of the EV market and meeting the state's charging and vehicle goals.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, and other industry leaders supporting transportation electrification.

### **Recommendations for the Second Solicitation**

CalETC appreciates the CEC's second solicitation proposal and the intent to open as many corridor groups as possible for funding. Collectively, we need to move quickly to achieve our ambitious zero-emission vehicle and refueling goals. CalETC recommends releasing the higher ranked corridor group first and allowing, but not requiring, those applicants to select another corridor group from the lower ranked corridor group. We believe that requiring applicants to choose a pair of corridor groups would be too onerous and discourage smaller market players from being able to participate. Further, we recommend including an enhanced incentive for the lower ranked corridor groups to incentivize applicants to choose a pair of corridor groups. For example, Colorado's NEVI program offers an additional \$25,000 per site per application.<sup>1</sup> So, if an applicant chose corridor group 4: Northeast State, US 395 to Oregon, they could receive an additional \$125,000 to build the

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<sup>1</sup> Colorado Energy Office, *DCFC Plazas Grant Application Guide*, p. 6, Enhanced Incentives for 3+ Locations, available at <https://drive.google.com/file/d/1-7nvsZb13xIGS5F6sD169U3XFleqZTA/view>.

5 charging stations. An enhanced incentive may be the difference for some applicants that may otherwise have difficulty building infrastructure in more remote areas.

Alternatively, we recommend the CEC consider allowing applicants to bundle sites but not necessarily build out entire corridor groups. A bundling approach would allow applicants to submit high-value projects in convenient, accessible locations. Requiring a single applicant to have sufficient real estate available to meet all the program requirements for a given corridor group may be too onerous and impair the rollout of program funding. Some flexibility within the bounds of the corridor groups would help accelerate the buildout and identify harder to reach areas.

### **Utility Verification Form Recommendations**

CalETC is wary of releasing all the corridor groups at once due to the utilities being inundated with requests to complete the Utility Verification Form (Form). During the first solicitation, utilities that have large or multiple corridor segments within their service territories received a significant number of requests to complete the Form. For example, PG&E received around 70 requests for unique sites the week of the application deadline. The flood of requests creates an unnecessary burden on utilities to complete the Form with information that is publicly available. We believe there is a way to build optionality into the Form that will allow applicants to either (1) self-verify by using publicly available capacity maps to complete the form or (2) if a capacity map is not available have the utility complete the form. Regardless of which path the CEC chooses for the second solicitation, CalETC believes these recommendations will significantly improve the application process for both the applicants and the utilities. Here is an outline of our proposed recommendations:

1. Self-verification: Modify the form to require applicants to pull relevant capacity data that is publicly available, for example from ICA or capacity maps, and submit this data as evidence of the current circuit and transformer capacity. Applicants should submit screenshots of the maps so the CEC can verify the information is correct. Self-verifying would require limiting question 10 to only apply when the utility is completing the form because determining a level of effort and time estimate needs to be done by the utility through a full analysis.

OR

2. Pre-Assessment, Service Request, or Utility Verification Form process: If the utility has a pre-assessment process, the applicant may use this process to complete the form. If the utility does not have a preassessment process, the Applicant may go through the normal service request or utility verification form process.

Additionally, we recommend removing Question 8 from the Form, which asks for the capacity of the associated substation. Some utilities find this question to be difficult to answer because it requires an analysis of all the circuits associated with the substation. If the CEC would like to keep the question because it enables a review of the likelihood that a funded project would be completed based on available substation capacity, we request that the question be made optional.

Thank you for your consideration of our comments. Please do not hesitate to contact me [kristian@caletc.com](mailto:kristian@caletc.com) should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'KAC', with a long horizontal flourish extending to the right.

Kristian Corby, Deputy Executive Director  
California Electric Transportation Coalition