

**DOCKETED**

<b>Docket Number:</b>	20-TRAN-04
<b>Project Title:</b>	Electric Vehicle Infrastructure Project Funding
<b>TN #:</b>	255317
<b>Document Title:</b>	BART Comments - Community Charging in Urban Areas
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	BART
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	3/28/2024 2:33:10 PM
<b>Docketed Date:</b>	3/28/2024

*Comment Received From: BART  
Submitted On: 3/28/2024  
Docket Number: 20-TRAN-04*

## **20-TRAN-04 Community Charging in Urban Areas**

*Additional submitted attachment is included below.*



**SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT**  
 2150 Webster Street, P.O. Box 12688  
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April 5, 2024

2024

**RE: Docket No. 20-TRAN-04**

Comments for Community Charging in Urban Areas

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Robert Powers  
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 7TH DISTRICT

Janice Li  
 8TH DISTRICT

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 9TH DISTRICT

Dear California Energy Commission Staff,

Thank you for the opportunity to provide comments on the proposed Community Charging in Urban Areas funding. The San Francisco Bay Area Rapid Transit District (BART) supports CEC’s Clean Transportation program goal to “to develop and deploy innovative technologies that transform California’s fuel and vehicle types to help attain the state’s climate change policies.” This program supports the goals laid out in BART’s Board-approved Electric Vehicle (EV) Charging Policy.

BART provides regional transit service, connecting five counties, and the Bay Area’s four largest cities (San Jose, San Francisco, Oakland, and Fremont) on 135 miles of track with 50 stations. Pre-pandemic ridership was over 410,000 weekday passengers. Multiple transit agencies also connect to BART. The majority of BART’s passenger service is on electrified rail, using 100% greenhouse gas free electricity in 2022.

We thank CEC staff for conducting its recent Pre-Solicitation Workshop for Community Charging in Urban Areas and soliciting feedback from stakeholders. In 2017, BART initiated a pilot project, installing 42 EV charging ports at the then newly completed Warm Springs BART Station in Alameda County, and four ports at the Lafayette Station in Contra Costa County. BART currently owns these chargers and contracts out for the maintenance. BART’s many learnings from this project include business model, fee charging structure, expected demand, and best location within the parking lot. Based on this successful pilot, BART plans to install Level-2 EV chargers in 3 – 10% of our 47,000 parking spaces across the Bay Area for our riders and surrounding community members. BART stations tend to be in or near disadvantaged communities. BART welcomes the opportunity to work with the CEC to increase EV charging infrastructure through our implementation. We compiled the following responses to questions posed in the workshop.

**Public Availability**

BART supports CEC’s consideration to require public availability for the installed chargers. BART respectfully requests that chargers must be available to members of the public for at least 12 hours a day. At most stations, BART requires riders to pay for parking from 4 am to 3 pm on weekdays— our parking garages do not require a fee to park outside of those hours. As we install EV chargers in our parking facilities, the intent is for the chargers to be used by BART riders during hours requiring parking payment and available to members of the public outside of those hours, namely nights and weekends. Arguably, BART parking could be considered open to the public, as our system is open to the public. However, we want to ensure our EV charging program aligns with the intent of the proposed funding.

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**Match Share**

BART appreciates the CEC's recommendation to require no match share for public agencies. Due to BART's planned implementation, we are seeking clarification on what level of private involvement would trigger the requirement for the 20% match share. BART released a Request for Proposals to select a third-party to design, install, own, operate, and maintain the EV chargers at BART stations. If BART submitted a successful application for this grant funding opportunity, most awarded funds would support the private third-party's work. As this is likely a non-standard set up, BART can seek clarification from CEC staff later if needed.

BART welcomes the opportunity to work with the CEC on this program. Should you have any further questions regarding BART's comments, please do not hesitate to contact me at [MMeaghe@bart.gov](mailto:MMeaghe@bart.gov). Thank you for your consideration.

Sincerely,



Monica Meagher  
Group Manager, Sustainability