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GRID Alternatives Comments for Community Charging in Urban Areas

Additional submitted attachment is included below.

April 5, 2024

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

VIA DOCKET
Energy Commission Docket 20-TRAN-04

Re: Comments for Community Charging in Urban Areas

Dear Commissioners and Energy Commission Staff:

GRID Alternatives ("GRID") is the country's largest nonprofit that builds community-powered solutions to advance economic and environmental justice through renewable energy. Since 2004, we've installed clean energy technologies for over 30,000 income-qualified households across the country. In recent years, we have paired our longstanding work on solar PV with increased access to electric vehicles, EV charging stations and battery storage deployment for income-qualified families, multifamily housing owners and community facilities in economic and environmental justice communities.

We appreciate the opportunity to submit the following comments and recommendations regarding the content presented in the Pre-Solicitation Workshop on Community Charging in Urban Areas held on March 7th, 2024. GRID supports the CEC's efforts to increase access to equitable charging infrastructure options in urban communities. The following are our comments and recommendations to consider as you finalize your solicitation:

Project Eligibility:

- **Incentivize projects built *specifically for* local low-income residents and community members, instead of just creating more charging for use by pass-through commuters.** One of GRID's biggest observations of public investment in charging infrastructure to date has been that funds have typically been leveraged by private entities intent on building infrastructure not for lower-income urban residents, but rather for higher income users *passing through* disadvantaged communities. These investments have value more broadly, but is not consistent with the goals of this particular solicitation. One way to prevent this outcome given the limited funding is to build prioritization into the solicitation. Additional points can be allocated to applicants that demonstrate that their project is not only located in a designated DAC or low-income community in an urban area, but sited at a location that low-income community

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members have access to, gather, or reside. Furthermore, the CEC can prioritize projects that demonstrate that the charging infrastructure being proposed is the result of a formal community engagement process that included the perspective of local low-income residents. Finally, the CEC can prioritize projects that propose additional community programming to help ensure that local low-income residents are able to have robust access to the new charging infrastructure, and at a minimum should allow bidders to incorporate this programming as an eligible expense.

- **Explore different strategies to advance goals around local labor.** The use of local labor on these projects is a great way to drive deeper economic impact in priority communities, with the caveat that defining "local labor" in a way that can be monitored and evaluated throughout the grant implementation process can be challenging. Workers move frequently, particularly given the housing crisis in many urban areas that lead to many working families moving out to far-flung suburbs in search of affordable housing, and then commuting back into urban centers each day for work. Another approach the Commission might explore is to incentivize or require applicants to partner directly with local workforce development organizations that are directly based in the project area and directly serve residents in the project area to implement workforce development programming as part of the broader project.

- **Create greater flexibility on the charger availability requirements.** We recommend that instead of a fixed minimum of 18 hours, the solicitation should allow the applicant to identify what is feasible to allow for safe access for its community members. In many of the communities we serve, some logical charging sites may be out of the applicant's ability to provide safe access to the chargers for as long as 18 hours a day. Having charging sites be safe and secure during nighttime hours can also potentially reduce the risk of vandalism and theft that can actually reduce the overall availability of the chargers over time, which is particularly critical for low-income residents who may have fewer alternatives.

Eligible Costs and Requirements:

- **Maintain and enhance match requirement flexibility for applicants who need it.** GRID supports the proposed no match requirements for public and non-profit applicants, and recommends considering that private entities that are designated minority-owned or women-owned for example have a lower match requirement than the suggested 20 percent match.

- **Consider increasing maximum costs for Level 2 and DCFC.** Based on EV charging installation projects and programs that GRID has been involved with, the maximum suggested reimbursements of both the Level 2 of $12,500 per port and DCFC of $100,000 per port are on the lower end, especially if the applicant is planning to include costs outside of just the equipment - labor, permitting, interconnection, and other associated costs of installation. Other state programs have a precedent for higher reimbursements than what is currently proposed in this program, including CARB's Clean Mobility Options program which has some parallels to this concept in terms of target audience. GRID recommends increasing the total reimbursable amounts to make the project feasible for applicants, in particular public and nonprofit entities.

Charging and Fueling Infrastructure (Includes Equipment and Installation)	Maximum Funding Amounts (per unit)
Level 2 electric vehicle supply equipment (EVSE) unit, including equipment and installation costs	Up to $30,000 for one dual port L2 (or two single port). CMO will fund only one unit per funded vehicle.
DC Fast Charge EVSE unit, including equipment and installation	Up to $112,000 per 50kW unit Up to $175,000 per 150kW unit Up to $250,000 per 350kW unit

From the Clean Mobility Options program Implementation Manual, Table 1, page 33.

- **Allow up-front grants or advance pay for applicants who need it.** We support comments that were made by other stakeholders at the workshop to allow for up-front grants or advance pay options rather than just a reimbursement model, at least for non-profit, community based organizations. The reimbursement model does not work for public and nonprofit organizations, in particular those working most closely with community members and in frontline communities. One solution is for the CEC to pay vendors directly for costs of labor, equipment and installation rather than have the awardee pay directly and wait for reimbursement.

- **Provide support to awardees to mee the proposed operation requirements and data collection requirements.** For public and nonprofit/community based applicants, both the operations requirements and data collection requirements would require working closely with higher capacity entities to fulfill, and the current funding structure for this program does not account for that time, technical expertise, and labor. We strongly encourage the CEC to provide the needed technical assistance in-house to those awarded to fulfill these requirements rather than put the onus on nonprofit/community based awardees to meet.

- **Ensure public charging that is installed is actually financially accessible to community members.** Much of the public charging available in frontline communities is not equitably accessible to community members.Typically it is more expensive to charge at a public charger than at home. We ask the CEC to carefully consider whether publicly available charging in any given community is equitably accessible to EV drivers or potential drivers living in the community. A portion of this funding could be dedicated to supporting equitable access to charging infrastructure for drivers who live in the identified priority community. Programming around subsidized access to public charging and public charging credits are an integral step towards increasing access to EVs in an equitable manner.

  In many cases, however, the major barriers to charging are information and programming that would enable access to charging infrastructure. In historically underserved communities, especially, we need to support community-based needs assessments, outreach, planning, and community engagement programs to increase utilization. We encourage the CEC to adopt broad definitions of terms such as:

- “Development phase activities”
- “Mapping and analysis activities” to include community engagement
- “Operating assistance” to include subsidized charging for targeted populations and other programs to increase utilization

Funding should favor installations that involve local residents and community groups in siting charging infrastructure, which will create more community support and utilization. CEC could encourage programs to make local residents more aware of charging infrastructure and to “activate” the charging infrastructure and make it more likely to be used. Examples can include:

- “Ride and drive” events
- Promotion of subsidized charging for low-income residents; or,
- Placement of shared electric vehicles at the charging locations and making them available for rent by local residents

Thank you for your consideration of our input on this exciting opportunity and much needed equity program. We look forward to collaborating with the commission to ensure that low-income and disadvantaged communities in urban areas of California have robust and equitable access to electric vehicle charging infrastructure.

Sincerely,

Zach Franklin
Strategic Impact Officer
GRID Alternatives