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**EVgo Comments In Response to Pre-Solicitation Workshop on
Community Charging in Urban Areas**

Additional submitted attachment is included below.

April 5, 2024

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket No. 20-TRAN-04 – Comments In Response to Pre-Solicitation Workshop on Community Charging in Urban Areas

EVgo appreciates the opportunity to submit comments on the California Energy Commission’s (CEC) pre-solicitation workshop on its Community Charging in Urban Areas (CCUA) program opportunity. As one of the nation’s largest public fast charging providers, EVgo recognizes that a convenient, widespread electric vehicle (EV) charging network – particularly in urban areas – is crucial for mass scale EV adoption needed to help achieve California’s equity, energy, decarbonization, and air quality goals. CCUA has the potential to accelerate deployment of EV charging in urban low-income and disadvantaged communities and EVgo commends the CEC for this initiative. To further enhance the program and ensure it supports widespread EV charging access in more communities across the state, EVgo provides the following feedback:

1. Provide a project eligibility map at the time of the solicitation release to improve program clarity;
2. Preserve project eligibility for a broad array of site types to support community charging needs;
3. Encourage, but do not require, specific port minimums, and instead seek to meet community charging needs through points-based scoring rubric; and
4. Preserve the 20% minimum match for total project costs for for-profit applicants and consider assessing the cost-effectiveness of each application on a dollar-per-kilowatt (\$/kW) basis.

1. Provide a project eligibility map at the time of the solicitation release to improve program clarity

EVgo appreciates CEC’s proposal to develop a user-friendly project eligibility map to help determine which sites could be eligible for CCUA. To ensure that applicants have enough time to use the map and identify potential projects ahead of the submission deadline, EVgo recommends that CEC release a project eligibility map no later than the time of the solicitation release.

2. Preserve project eligibility for a broad array of site types to support community charging needs

In its presentation, the CEC identified several potential site types that could be eligible for CCUA.¹ EVgo encourages CEC to maintain a broad list of eligible site types, in a manner consistent with flagship CEC

¹ Presentation - Pre-Solicitation Workshop Community Charging in Urban Areas at 20, available at: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=254736&DocumentContentId=90363>

block grants like CALeVIP 2.0², to best support community charging needs. CALeVIP 2.0's first two solicitations, which were exclusively focused on serving disadvantaged communities (DACs), were successful in part because of the wide variety of eligible site types – including grocery stores and retail shopping areas. Moreover, CCUA's focus on both L2 and DCFC suggests the need for a broad array of eligible site types, matching charging speed to the dwell time of the location. For example, L2 chargers may be better suited to long dwell-time locations such as libraries or schools whereas DCFC infrastructure is more appropriate at retail areas and other locations with shorter dwell-times.

3. Encourage, but do not require, specific port minimums, and instead seek to meet community charging needs through points-based scoring rubric

In its presentation, the CEC proposed a wide range of charger port minimums for eligible CCUA projects.³ Instead of establishing minimum port counts, EVgo recommends that the CEC encourage, but not require, larger projects through its solicitation scoring criteria and its points-based scoring rubric. These criteria should also distinguish between L2 ports and DCFC ports, which have different charging capabilities and siting considerations.

As EV adoption grows, it will be critical to continue to invest in larger, faster, more convenient charging stations to improve redundancy for customers and reduce queuing. However, individual site locations will have their own constraints – be it from the property owner, utility, or some other factor – that may limit the station footprint. As such, while a larger station footprint should be the trend, the CEC should not unduly limit possible strong, ideal customer locations by prescribing a minimum port for this solicitation and should instead deem its preference for larger sites through its scoring criteria.

4. Preserve the 20% minimum match for total project costs for for-profit applicants and consider assessing the cost-effectiveness of each application on a dollar-per-kilowatt (\$/kW) basis

EVgo supports the 20% minimum match for for-profit applicants based on total project costs. This match level is consistent with programs like the National Electric Vehicle Infrastructure (NEVI) program⁴ and the CEC's Reliable, Equitable, and Accessible Charging for Multi-family Housing 2.0 solicitation.⁵ If the CEC decides to evaluate CCUA applications based on cost-effectiveness, EVgo recommends that the CEC evaluate projects based on a \$/kW basis rather than on an absolute dollar basis.

Evaluating projects on a \$/kW basis reasonably encourages high-power DCFC and large sites while encouraging efficient use of program funding in line with the CEC's goals. In other words, a \$/kW metric prioritizes projects of comparable size that will deliver greater charging capability for the same or lower cost than similar projects with lower capacity. In its EV charging incentive program, the Bay Area Air Quality Management District (BAAQMD) evaluates applications based on \$/kW cost-effectiveness, which

² <https://calevip.org/incentive-project/gssp-incentive-east-central>

³ See footnote 1 at slide 27.

⁴ <https://www.federalregister.gov/documents/2023/02/28/2023-03500/national-electric-vehicle-infrastructure-standards-and-requirements>

⁵ <https://www.energy.ca.gov/solicitations/2023-04/gfo-22-614-reliable-equitable-and-accessible-charging-multi-family-housing-20>

prioritized applicants that requested less funding per kW of capacity.⁶ If the CEC solely evaluated projects based on absolute cost, the CEC may inadvertently discriminate against projects that feature higher power 350 kW DCFC which, from the CEC's own analysis, is expected to be the most prevalent fast charging technology in California needed to meet state EV charging goals.⁷ Moreover, this approach would also disadvantage larger sites that feature more ports, as these projects would likely have higher costs than smaller sites. To avoid this outcome and promote cost efficiency, EVgo recommends instead evaluating projects on a \$/kW basis.

Conclusion

EVgo commends the CEC for its development of CUA and looks forward to further supporting access to convenient, accessible fast charging in urban areas as part of our collective climate, air quality, and EV goals.

Respectfully submitted this 5th Day of April,

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⁶ Light Duty Electric Vehicle Infrastructure 2021 Funding Opportunity, California VW Mitigation Trust (July 2021). Available at <https://www.californiavwtrust.org/wp-content/uploads/CAVW-Trust-QA-72021.pdf>.

⁷ The CEC's EV Charging Demand Assessment (p. 54) anticipates that 350 kW chargers will become the dominant DCFC technology in California.

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=251866&DocumentContentId=86859>