

**DOCKETED**

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*Comment Received From: California Fuels & Convenience Alliance  
Submitted On: 5/13/2024  
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## **California Fuels & Convenience Alliance Comments**

*Additional submitted attachment is included below.*



California Fuels and Convenience Alliance

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May 10, 2024

California Energy Commission  
715 P Street, MS-4  
Sacramento, CA 95814

California Department of Transportation  
1120 N Street  
Sacramento, CA 95814

**RE: [Docket# 22-EVI-03] 2024 Update NEVI Formula Program Deployment Plan**

Dear Commissioners,

The California Fuels and Convenience Alliance (CFCA) represents about 300 members, including nearly 90% of all the independent petroleum marketers in the state and more than one half of the state's 12,000 convenience retailers. Our members are small, family- and minority-owned businesses that provide services to nearly every family in California. Additionally, CFCA members fuel local governments, law enforcement, city and county fire departments, ambulances/emergency vehicles, school district bus fleets, construction firms, marinas, public and private transit companies, hospital emergency generators, trucking fleets, independent fuel retailers (small chains and mom-and-pop gas stations) and California agriculture, among many others.

On behalf of CFCA, we appreciate the opportunity to provide feedback on the National Electric Vehicle Infrastructure (NEVI) Plan Update for 2024. We commend the efforts of the California Energy Commission (CEC) and California Department of Transportation (Caltrans) in advancing the development of reliable EV charging infrastructure across the state. We would like to share recommendations on how the program can be improved to achieve a more successful implementation of the program's intent.

We strongly recommend leveraging the existing network of fuel retailers as the most expedient and efficient method for establishing a nationwide EV charging infrastructure. These retailers, strategically located along highways at intervals of 50 miles and within a mile from exits, are ideal candidates for the NEVI grant program. Beyond their convenient locations, fuel retailers offer essential safety amenities such as restrooms and food services, enhancing the overall charging experience for drivers. It is noteworthy that over half of the new charging stations funded under the NEVI program are slated for construction at truck stops, travel centers, and other fuel retailers, underscoring their commitment to expanding EV charging solutions.

However, there is growing concern within the retail fuel industry regarding the "grouping" method employed under California's NEVI program. This approach, dividing the state into corridor zones and awarding exclusive contracts to a single entity within each segment, has deterred participation from California's fuel retailers. Unlike the enthusiastic engagement witnessed across the country, the

segmented approach excludes businesses tied to specific real estate locations. Consequently, retailers lacking multiple suitable locations within designated segments are effectively barred from competing for grant funding, limiting local business participation in the program.

To address the aforementioned challenges and enhance retail involvement in the NEVI program, we propose adopting a more flexible evaluation process. By allowing individual station applications along designated corridors, the eligibility pool can be expanded to include potential NEVI applicants who are unable to oversee an entire corridor. Additionally, implementing a site-by-site submission process would expedite operations at ready sites, mitigating the delays associated with coordinated development along entire travel corridors.

Especially challenging for small operators are the constraints related to time and infrastructure capacity. New-to-industry sites face difficulty in meeting NEVI application deadlines prior to commencing construction. Additionally, the current counting method for charging units poses challenges, as multi-port chargers such as Freewire units are not counted proportionally to their capacity. This discrepancy not only affects the feasibility of installing multiple chargers but also raises concerns regarding space allocation, ADA compliance, and power requirements.

In conclusion, we appreciate the opportunity to contribute to the NEVI Plan Update for 2024. We urge the California Energy Commission and California Department of Transportation to consider our recommendations for a more inclusive and flexible approach to the NEVI program. By fostering greater collaboration with the retail fuel industry, we can accelerate the deployment of EV charging infrastructure and promote sustainable transportation alternatives across California.

Thank you for considering our comments. If you have any questions, please contact Alessandra Magnasco at [alessandra@cfca.energy](mailto:alessandra@cfca.energy).

Sincerely,

A handwritten signature in black ink, appearing to read "Alessandra Magnasco". The signature is fluid and cursive, with the first name being more prominent.

Alessandra Magnasco  
Governmental Affairs & Regulatory Director