

DOCKETED

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CalETC's Comments on Joint NEVI Deployment Plan Update

Additional submitted attachment is included below.



May 28, 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 Joint CEC-Caltrans NEVI Deployment Plan Update

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) Deployment Plan Update held on May 10, 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.

CalETC has long advocated for funding for both light-duty (LD) and medium- and heavy-duty (MHD) zero emission vehicles and charging infrastructure. To meet the state's ambitious goals we need funding for both. While CalETC is supportive of the possibility of using some of the remaining NEVI funding for MHD charging, there are issues that need to be addressed before allocating, or preferably, making funds available to both LD and MHD. The issue of timing is key: when could the remaining NEVI funds be made available for a MHD solicitation? If the answer to that question is after all the LD stations are built out along the alternative fuel corridors (AFCs), which could take several years, then CalETC is skeptical about holding those funds back for several years when we need funding for LD and MHD charging projects now. It is counter to our goals to let over \$200 million sit on the sidelines when we need to install infrastructure at a record pace to meet our charging goals.¹ In that case, we would recommend continuing to solicit charging infrastructure for LD stations on AFCs. That said, CalETC recommends the CEC give a plus up in funding for applicants

¹ The California Energy Commission (CEC) forecasts that we will need 1.01 million EV chargers by 2030 to support approximately 7 million light-duty EVs. We currently have only 94,000 chargers, just 10% of the chargers we will need in 2030, which means we have only six years to install roughly 900,000 chargers.

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that seek to collocate 150 kW stations with 350 kW stations, which could also serve MHD ZEV trucks. These sites would need to be designed with dual purpose pull-through parking lanes so MHD trucks and LD ZEVs towing a trailer could easily charge. Creating a dual purpose plus up for stations that can serve both LD and MHD ZEVs would help California make strides to achieve its ambitious charging goals.

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

Sincerely,

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

Kristian Corby, Deputy Executive Director
California Electric Transportation Coalition