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EVgo Comments on CTP Investment Plan

Additional submitted attachment is included below.

June 21, 2024

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket No. 24-ALT-01 – Public Meeting of the Advisory Committee for the Clean Transportation Program Investment Plan

EVgo appreciates the opportunity to submit comments on the California Energy Commission's (CEC) June 7th Public Meeting of the Advisory Committee for the Clean Transportation Program (CTP) Investment Plan. As one of the nation's largest public fast charging providers, EVgo shares the CEC's vision for an elevated customer experience for EV drivers and recognizes that a reliable, widespread EV charging network is crucial for scaling EV adoption needed to help achieve California's equity, clean energy, decarbonization, and air quality goals.

The CTP is foundational for enabling the achievement of the state's policy goals and EVgo commends the CEC's leadership in accelerating EV adoption through a diverse portfolio of EV charging programs. For example, CALeVIP 2.0 launched in January 2023 with up to \$250 million in funding and introduced key enhancements to improve program efficiency after approximately five years of CALeVIP 1.0. Through these enhancements, CALeVIP became a national best practice in program design as processing timelines for EVgo applications decreased from 286 days to 29 days relative to CALeVIP 1.0 – signaling remarkable progress. These improvements included the introduction of a tiered lottery system to promote shovel-ready projects while discouraging speculative applications that were blocking the queue, and an increase in the number of eligible active connectors per site to enhance the customer experience. These program design enhancements were implemented in two solicitations – East/Central¹ and North/South² regions – in 2023 that resulted in funding for the deployment of over 750 direct current fast charging (DCFC) stalls in disadvantaged- or low-income communities (DAC/LIC).

The recommendations below are intended to further enhance the effectiveness of the CTP and provide more transparency to the EV charging industry.

¹ <https://calevip.org/incentive-project/gssp-incentive-east-central>

² <https://calevip.org/incentive-project/gssp-incentive-north-south>

- 1. Standardize recurring funding cycles and schedules to create a more stable business environment for EV charger deployment.**
 - 2. Continue to focus on repeatable direct current fast charging funding opportunities like CALeVIP 2.0, Fast and Available Charging for All Californians (FAST) and Community Charging in Urban Areas that provide fast charging access in high-value locations.**
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- 1. Standardize recurring funding cycles and schedules to create a more stable business environment for EV charger deployment.**

EV charging providers make business decisions based on the public information that the CEC provides about its block grant opportunities. To the extent possible, a simple, predictable, and durable cycle of future solicitations for the CEC's EV charging blocks grant would support more efficient capital planning and submission of high-quality projects that meet CEC's specifications as well as state infrastructure needs. Moreover, transparent scheduling creates a more stable business environment for California's growing clean energy economy and will lead to more consistent deployments of charging infrastructure. For example, Colorado Energy Office's *Charge Ahead Colorado* EV charging grant program provides three standard application funding rounds annually in January, May, and September.³ This standardized application window approach could provide more certainty for applicants in a manner that supports California's nation-leading EV charging deployment goals.

Since the latest application window closed in December 2023, there has not been any public notice of future solicitations akin to the ones described by the CEC when CALeVIP 2.0 was launched – marking a departure from the last six years of relatively predictable block grant funding to support the development of a widespread, accessible DCFC network in California.⁴ Uncertainty around CALeVIP 2.0 schedules has adverse impacts on the siting and development of shovel-ready DCFC projects. Delays can increase the risk that project permits expire, grid capacity at sites becomes less available, and easements become increasingly challenging to execute. These factors increase the soft costs of charger deployment, can prevent the submission of Tier 1 applications that meet the CEC's highest level of project readiness, and ultimately lead to delays for much-needed charging infrastructure to meet California's goals.

³ <https://energyoffice.colorado.gov/charge-ahead-colorado>

⁴ <https://www.energy.ca.gov/event/webinar/2022-05/calevip-20-public-workshop>

2. Continue to focus on repeatable direct current fast charging funding opportunities like CALeVIP 2.0, Fast and Available Charging for All Californians (FAST), and Community Charging in Urban Areas in 2024-2025 that provide fast charging access in high-value locations

Finally, DCFC stations remain a critical part of California’s EV charging portfolio: they support the charging needs of Californians without access to home charging⁵, enable the electrification of on-demand transportation services needed to meet Clean Miles Standard goals⁶, and provide key refueling opportunities for long-distance travel. EVgo supports the CEC’s continued focus on targeted funding opportunities in the CTP to build out needed DCFC infrastructure and ensure that all Californians can realize the benefits of transportation electrification. In addition to re-opening CALeVIP 2.0 in 2024, EVgo supports continued focus on grants such as FAST and Community Charging in Urban Areas that have either been successful at scaling DCFC stations or are well-positioned to increase fast charging access in targeted communities across the state.

Conclusion

EVgo appreciates the opportunity to submit feedback on CEC’s 2024-2025 Investment Plan Update. With strategic planning and greater scheduling certainty, the CEC can leverage the CTP Investment Plan process to accelerate progress on charging infrastructure buildout necessary to achieve state policy goals.

Respectfully submitted this 21st day of June,

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⁵ <https://innovation.luskin.ucla.edu/wp-content/uploads/2021/03/Evaluating-Multi-Unit-Resident-Charging-Behavior-at-Direct-Charging-Behavior-at-Direct-Current-Fast-ChargersCurrent-Fast-Chargers.pdf>

⁶ <https://evgo.com/press-release/evgo-recognizes-massive-rideshare-growth-as-commercial-throughput-more-than-tripled-year-over-year-in-q1/>