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*Comment Received From: John Reister  
Submitted On: 6/21/2024  
Docket Number: 24-ALT-01*

## **GoPowerEV Comments on 2024-2025 Investment Plan Update for the Clean Transportation Program**

CEC is urged to immediately adopt crucial modifications to the CTP to align incentives to encourage lower cost and rapidly scalable EV charging solutions, such as allowing for Level 1 and low-power Level 2 charging at assigned parking spaces in multifamily residential parking facilities.

*Additional submitted attachment is included below.*

## GoPowerEV

2935 Alexis Drive  
Palo Alto CA 94304

June 20, 2024

California Energy Commission  
Docket Office  
715 P Street  
Sacramento, CA 95814-5512  
[Docket@energy.ca.gov](mailto:Docket@energy.ca.gov)

### **Re: GoPowerEV Comments on 2024-2025 Investment Plan Update for the Clean Transportation Program, Docket No. 24-ALT-01, California EV Charging Programs Urgently Need to Focus on Most Economical, Scalable and Equitable EV Charging Solutions**

Dear Director Rasool and Advisory Committee members,

GoPowerEV, a California-based provider of cost-effective multi-family housing EV charging, appreciates the opportunity to provide comments to the California Energy Commission (CEC) staff following the June 7, 2024, public meeting of the Advisory Committee for the Clean Transportation Program (CTP) where staff presented an overview of the draft version of the 2024-2025 Investment Plan for the Clean Transportation Program (Plan).

CEC is urged to immediately adopt crucial modifications to the CTP to improve EV charging incentives for multi-family residential property owners to install economical and convenient EV charging solutions for their residents – especially those in DAC areas.

The right sizing of charging equipment is vital to address equity issues of all multifamily residents and for the long-term stabilization of the grid. When charging at home conveniently where they park their vehicles overnight, “right-sizing” means 40-60 miles of charging per 10-hour overnight charge. This meets 90% of drivers’ daily needs, and can be achieved via a hybrid of low-power L2 and L1 charge ports. Inclusion of the low-power L2 option provides 150 miles of range overnight, and meets over 97% of daily driving needs. The installed cost of these L1 and low-power L2 ports is 75% cheaper than faster L2 charging ports.

Right-sizing charging equipment for actual EV driver needs reduces installation costs, equipment costs, and maintenance costs. It enables more EV charging to be installed within limited budgets. Right sizing charging equipment provides more charging access, at a lower cost per charging port, while avoiding immediate grid or service capacity upgrades.

To prevent California from falling further behind EV charging targets, CEC must adopt crucial modifications to the CTP to align on EV charging incentives to accelerate the installation of Level 1 and low-power Level 2 EV charging infrastructure at multifamily residential properties.

The CALeVIP program has been a hindrance to ubiquitous adoption of convenient charging with its focus on 7 kW, shared Level 2 installations. The CALeVIP light-duty EV charging program funded by the CTP, produced only 1,500 EV chargers at multifamily properties across the entire state over the past 4 years squandering over \$8 million in incentives.

The CTP EV charging incentives should align with the goal of each year converting 200,000 multifamily residential parking spaces to EV charging stalls until the goal of 1.1 million EV chargers is met.

Single family homeowners have an inherent incentive to convert their parking spaces into EV charging stalls – they save money, achieve convenience and significantly improve their environment: no oil leaks, transmission leaks or other ICE fluid leaks.

Residents of multifamily properties don't control the economic benefit of converting parking spaces to Level 1 and low power Level 2 EV charging stalls. Just as incentives target single family property owners, CTP incentives must target and motivate multifamily property owners to convert all parking spaces to Level 1 and low power Level 2 EV charging stalls.

Even at the overly generous CALeVIP incentives, multifamily property owners are not motivated to pull additional funds from their pockets to build high power Level 2 charging stations where the t EV owner-residents fight over scarce shared charging spaces and won't scale for anticipated EV adoption.

On average, drivers travel 37 miles per day on U.S. roads, according to the U.S. Department of Transportation's Federal Highway Administration.

CEC is urged to immediately adopt crucial modifications to the CTP to align incentives to encourage lower cost and rapidly scalable EV charging solutions, such as allowing for Level 1 and low-power Level 2 charging at assigned parking spaces in multifamily residential parking facilities.

Sincerely,



John Reister  
CEO  
GoPowerEV Inc.