

**DOCKETED**

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**SWTCH Comments on 2024â€™2025 Investment Plan Update for the  
Clean Transportation Program**

*Additional submitted attachment is included below.*



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June 21, 2024

California Energy Commission  
715 P Street  
Sacramento, CA 95814

Re: Docket No. 24-ALT-01 - Comments on 2024–2025 Investment Plan Update for the Clean Transportation Program

Dear Commissioner Monahan and California Energy Commission staff:

SWTCH respectfully submits these comments on the California Energy Commission (Commission's) 2024–2025 Investment Plan Update for the Clean Transportation Program (CTP). SWTCH supports the California Energy Commission (Commission's) efforts to increase EV charging infrastructure, especially in community and multifamily locations. SWTCH appreciates the Commission's past funding plans and impact on EV charging infrastructure charging to date. We offer specific recommendations in response to the May 2024 Draft Staff Report and June 7, 2024 Public Advisory Committee meeting to advance the Commission's track record of meaningful programs that expand deployments and access to equitable EV charging infrastructure.

### About SWTCH

SWTCH is a leading provider of electric vehicle (EV) charging and energy management solutions for multifamily, commercial, and workplace properties in California and across North America. Our end-to-end solution optimizes EV charging usage and manages load to benefit drivers, property owners, and the grid. SWTCH has deployed more than 15,000 chargers across North America, with a strong focus on equitable access. SWTCH's charging management platform is built upon a foundation of open communication standards and interoperability to prevent stranded assets and to ensure future flexibility, scalability, and innovation.

### Comments

1. **SWTCH urges equity in funding support for light-duty EV infrastructure and medium-and heavy-duty EV infrastructure.** The Commission has proposed \$37.0 million for light-duty (LD) charging infrastructure and \$55.2 million for medium-and heavy-duty (MHD) infrastructure for FY 2024 - 2025. Both sectors are critical to California's transportation decarbonization and public health goals, and have significant needs to achieve California's EV charging deployment targets. MHD infrastructure has received an estimated \$2.4 billion in Commission funding to date, with some estimates that this sector could be currently eligible for over \$300 billion in federal funding programs.<sup>1</sup> The Commission plans to allocate an additional \$810 million to MHD ZEV infrastructure through FY 2027- 2028. By contrast, the

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<sup>1</sup> Lepre, Nicole. "Estimated \$30 Billion Committed to Medium- and Heavy-Duty Charging Infrastructure in the United States." *Atlas EV Hub*, January 2024, [https://www.atlasevhub.com/data\\_story/estimated-30-billion-committed-to-medium-and-heavy-duty-charging-infrastructure-in-the-united-states/](https://www.atlasevhub.com/data_story/estimated-30-billion-committed-to-medium-and-heavy-duty-charging-infrastructure-in-the-united-states/).

- Commission plans to allocate \$656 million in that same time period to help build out 7x the number of light-duty chargers by 2030 as what is needed for MHD infrastructure.<sup>2</sup> Even factoring in federal funding such as the National Electric Vehicle Infrastructure (NEVI) Formula Program, there may be a disproportionate level of public investment available to MHD EV charging infrastructure relative to LD infrastructure. For this reason, SWTCH urges that funding levels are equitable and representative of near-term sector needs.
2. **SWTCH recommends simple and consistent light-duty funding cycles.** CTP block grants have served as a cornerstone for supporting streamlined and equitable deployment of EV charging infrastructure across California. These programs are critical to allow EV charging providers to make business decisions based on the public information that the Commission provides about its block grant opportunities. To the extent possible, a simple, predictable, and durable cycle of future solicitations for the Commission's EV charging block grants would support more efficient capital planning and submission of high-quality projects that meet Commission specifications as well as state infrastructure needs. This stability is increasingly important considering California's Low Carbon Fuels Standards credit market, upward pressure on electricity rates, and emerging deployment opportunities in other regions. Even with varying levels of funding, a standardized application approach could provide more certainty for applicants in a manner that supports California's nation-leading EV charging deployment goals.
  3. **SWTCH recommends the majority of light-duty infrastructure funding be allocated to the Communities in Charge (CIC) program.** The vast majority of California renters, especially from disadvantaged communities, live in multifamily housing. 80% of charging occurs at home,<sup>3</sup> and multifamily housing has split-incentive challenges between landlords and renters that impede at-home EV charging deployments. Moreover, at-home charging allows EV drivers to take advantage of time-of-use electricity rates and managed charging technologies that generate cost savings compared to other forms of public charging. The CIC program offers a well-designed grant that incentivizes charging in multi-family housing among other 'Community Connections' locations where people live and gather. The other light-duty infrastructure block grant, CALeVIP, has received over \$250 million for publicly DC fast charging compared to \$68 million for the CIC program to date. Other federal funding sources like NEVI will continue to provide a consistent stream of funding for these types of public fast chargers. By contrast, the federal Charging and Fueling Infrastructure Grant Program, intended for community and multifamily charging, is discretionary and less dependable for applicants. For these reasons, SWTCH recommends a majority of the Commission's light-duty infrastructure funding be made available through the CIC program.
  4. **SWTCH supports the Commission working closely with California executive, legislative, and Air Resource Board leaders to move future Greenhouse Gas**

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<sup>2</sup> Benjamin Tuggy, et al. "Draft Staff Report 2024 - 2025 Investment Plan Update for the Clean Transportation Program." California Energy Commission. May 2024.  
<https://www.energy.ca.gov/programs-and-topics/programs/clean-transportation-program/clean-transportation-program-investment-9>

<sup>3</sup> Michael Blonsky, et al. "Incorporating Residential Smart Electric Vehicle Charging in Home." National Renewable Energy Report. Energy Management Systems, April 2021.  
<https://www.nrel.gov/docs/fy21osti/78540.pdf>

**Reduction (GGRF) funding forward in the next budget cycle.** Given the investments needed to rapidly expand charging infrastructure and meet California's EV and charging deployment goals, SWTCH recommends shifting future fiscal allocations from the GGRF forward from FY 2027 - 2028 to earlier fiscal years. Earlier disbursements of this funding will ensure California is charting a path to meet its infrastructure deployment and decarbonization goals, and not scrambling in future years to make up the difference. SWTCH encourages the Commission to engage early on in the budget cycle with decision-makers to move future funding forward.

### In Closing

SWTCH appreciates the steps that the Commission is taking to scale EV infrastructure across California and the opportunity to comment on these matters. If you have questions or if I can provide more information, please contact me at [ben.brint@swtchenergy.com](mailto:ben.brint@swtchenergy.com) or 415.535.8444.

Respectfully,



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