

DOCKETED

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**Redwood Coast Energy Authority Comments - Applicant
Comments from Redwood Coast Energy Authority**

Additional submitted attachment is included below.



REDWOOD COAST Energy Authority

Blue Lake Rancheria • Yurok Tribe • County of Humboldt • Arcata • Blue Lake • Eureka • Ferndale • Fortuna • Rio Dell • Trinidad • Humboldt Bay Municipal Water District

August 9, 2024

California Energy Commission
Clean Transportation Program
715 P Street
Sacramento, CA 95814

Docket No: 19-TRAN-02

RE: Staff Pre-Solicitation Workshop for Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure

Dear California Energy Commission Staff,

Thank you for the opportunity to engage in public discourse on state-level charging infrastructure. The Redwood Coast Energy Authority (RCEA) was formed in 2003 as a Joint Powers Authority (JPA), a local government agency of the State of California. RCEA is governed by an eleven-member Board of Directors comprised of representatives from each of its member agencies, including the Blue Lake Rancheria, County of Humboldt, the Cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Dell and Trinidad, the Humboldt Municipal Water District, and the Yurok Tribe. RCEA's mission is to develop and implement sustainable energy initiatives that reduce energy demand, increase energy efficiency, and advance the use of clean, efficient and renewable resources available in the region. In 2017, RCEA became a community choice aggregator (CCA) and currently serves 93% of eligible electricity customers within its jurisdiction.

Humboldt County is considered a hard-to-reach, underserved region, with a population density of 38 persons per square mile, and in 2020 a per-capita personal income ranked 38 out of 58 counties. RCEA currently owns, operates, and maintains a network of twenty-nine (29) publicly available electric vehicle charging stations (EVCS) offering fifty-six (56) Level-2 charging ports to communities across the county. RCEA was awarded funds to develop a Blueprint for Medium- and Heavy-Duty (MDHD) Zero-Emission Vehicle and Infrastructure via Grant Funding Opportunity 20-601; RCEA's Blueprint was completed, submitted, and received CEC approval of our Final Blueprint in March of 2024.

RCEA respectfully submits the following comments:

1. RCEA recognizes that more ports per site improves overall cost effectiveness by spreading out fixed costs. At the same time this becomes a barrier to rural settings. We propose that the grant criteria allow a lower port count for locations that meet specific rural criteria for the following reasons:

- a. Most rural high-speed charging use cases require a low port count in the next decade except for rare conditions such as interstate truck depots. In these settings a minimum port count likely restricts grant access to very high-use locations. We propose that the grant criteria include a lower port count for rural settings that meet specific criteria.
 - b. Higher port counts restrict possible sites to those with ample interconnection capacity. Given limited and outdated rural grid infrastructure, allowing 2-4 DCFC ports will reduce project failure rates once interconnection costs become apparent. The increased load requirements of larger installations are also more likely to trigger higher interconnection costs such as reconductoring and substation upgrades.
2. From a public-charging perspective, the state requires a distributed network of chargers to support broad electric vehicle adoption. With their profit motive, the private sector by default focuses on high-value locations with some consideration for loss-leading locations if it helps to establish market share dominance. Locations with lower economic value become laggards, which delays a functional statewide network. Since high utilization, high port-count locations are viable with private funding, we recommend that state funding focuses on sites that are not financially attractive to the private sector, and unlikely to receive infrastructure without state grant subsidy.
3. Economically poor regions also struggle to attract private investment until more lucrative markets saturate. For the same reasons discussed above, we propose that the state focus grant funds on equity regions, specifically Disadvantaged and Low-Income Communities (AB 1550).
4. To the question "Should applicants be allowed to propose sites not in their original blueprint?", RCEA would argue that since the Contract Agreement and Scope of Work from our awarded Blueprint agreement (ARV-21-035) did not require the identification of specific sites for build-out or project implementation, the implementation dollars cannot be constrained without unintentionally excluding accepted Blueprints. RCEA's approved approach was based on a broad, regional study, covering 3 rural Counties (Humboldt, Trinity and Del Norte) rather than just focus on one specific fleet or location. RCEA believes implementation dollars should be made available to all entities with a completed, submitted, and approved Final Blueprint, and should be able to propose implementation strategies that would be informed and supported by the research and findings in their Blueprint, and that such strategies should be eligible for implementation funding.

Thank you again for your consideration and ongoing dedication to accelerate transportation electrification across the state and quickly achieve our sweeping decarbonization goals.

Sincerely,



Mike Avcollie

Senior Manager

Infrastructure and Transportation Department

Redwood Coast Energy Authority