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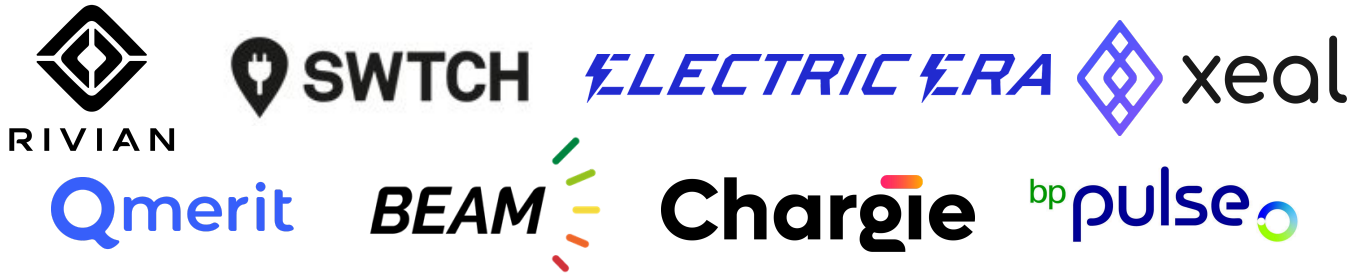
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## **Electric Vehicle Charging Association Comments on the 2024-25 CTP Investment Plan Update**

Please find attached the Electric Vehicle Charging Association's comments to the revised staff draft report for the 2024-2025 Clean Transportation Program Investment Plan Update.

*Additional submitted attachment is included below.*



October 22, 2024

California Energy Commission  
Docket No. 24-ALT-01  
715 P Street  
Sacramento, California 95814

**RE: Docket No. 24-ALT-01 – Revised Staff Draft Report for the 2024–2025 Clean Transportation Program Investment Plan Update**

Dear Commissioners and Staff,

The Electric Vehicle Charging Association (EVCA) appreciates the opportunity to provide comment on the revised staff report for the 2024-2025 Clean Transportation Program (CTP) Investment Plan Update.

EVCA is a not-for-profit trade organization of 22 leading EV charging industry member companies and one zero-emission autonomous fleet operator. The association was established in 2015 to comprehensively represent the entire EV charging value chain and provide a collective industry voice for decision-makers in California.

EVCA would like to commend staff for taking into account the feedback and recommendations made by industry stakeholders after the last CTP Advisory Committee meeting in June, and EVCA supports the Commission’s decision to make additional funds available for light-duty charging infrastructure over the coming year.

While California continues to lead the nation in EV charger deployment, as noted in the draft report, the state will need to nearly double the size of its existing and planned network over the next five years to meet its 2030 target. Maintaining an equitable approach toward funding light-duty and medium- and heavy-duty infrastructure, as provided under this latest revision, will allow California to continue making progress toward its essential infrastructure goals.

To further ensure California remains on track, EVCA would encourage the Energy Commission to leverage the CTP's reliable and consistent funding to provide program applicants with clear and predictable grant funding cycles.

CTP block grants have served as a cornerstone for the streamlined and equitable deployment of EV charging infrastructure across California since 2009, and EVCA was proud to support the program's reauthorization in 2023 to provide ZEV infrastructure with a dedicated revenue stream. This consistency is in contrast to other programs reliant upon year-to-year allocations by the Legislature, and is particularly valuable in light of the state's ongoing budget challenges.

To the extent possible, a simple, predictable, and durable cycle of future solicitations for the CEC's EV charging blocks grants would provide applicants with the certainty and market stability needed for more efficient capital planning and the development of higher-quality projects that better meet the CEC's specifications and state infrastructure needs. Even with varying levels of funding, a standardized application window would provide more certainty for applicants working to achieve California's nation-leading EV charging deployment goals, stability that is increasingly important considering California's current Low Carbon Fuel Standard credit market, upward pressure on electricity rates, and emerging deployment opportunities in other regions.

EVCA appreciates the Commission's willingness to engage on these concerns over the past several weeks, and we look forward to continuing our partnership with the CEC as it finalizes its 2024-2025 Investment Plan Update.

Sincerely,

**Reed Addis**

Governmental Affairs  
Electric Vehicle Charging Association

**Ben Brint**

Public Policy Manager, Western U.S.  
SWTCH

**Brian Kyuhoon No**

Head of Government Affairs  
Electric Era

**Heidi Sickler**

Utility and Advocacy Lead - West  
bp pulse

**Jaideep Upadhyay**

Director of Government Affairs  
Chargie

**Joseph Nickerson**

Head of Government Affairs  
Beam Global

**Kelsey G. Johnson**

Sr. Lead Policy Advisor - Energy & Charging  
Rivian

**Michael Roppolo**

Chief Corporate Development Officer  
Qmerit

**Michael A. Smith**

Head of Deployments and Policy  
Xeal