

DOCKETED

Docket Number:	24-ALT-01
Project Title:	2024–2025 Investment Plan Update for the Clean Transportation Program
TN #:	259653
Document Title:	Rhiannon Davis Comments - Electrify America Comments - Comments on 24-25 CTP Investment Plan Update
Description:	N/A
Filer:	System
Organization:	Rhiannon Davis
Submitter Role:	Public
Submission Date:	10/22/2024 4:14:52 PM
Docketed Date:	10/22/2024

Comment Received From: Rhiannon Davis
Submitted On: 10/22/2024
Docket Number: 24-ALT-01

Electrify America Comments - Comments on 24-25 CTP Investment Plan Update

Please see our comments in the attached document.

Additional submitted attachment is included below.



October 22, 2024

Commissioner Patty Monahan
California Energy Commission
715 P Street
Sacramento, California 95814

RE: Comments on the Revised 2024-2025 Investment Plan Update for the Clean Transportation Program

Dear Commissioner Monahan:

Electrify America appreciates the opportunity to comment on the California Energy Commission's (CEC) 2024-2025 Investment Plan Update for the Clean Transportation Program (Investment Plan), and the related October 1, 2024, Advisory Committee Meeting.

Electrify America is the nation's largest open network of DC fast chargers (DCFC) for electric vehicles (EVs), with over 4,250 fast chargers across 950 locations around North America, and over 1,100 chargers across more than 250 locations open to the public in California. In California alone, over 55% of our stations are in low-income and disadvantaged communities (LIC/DAC).

Prioritize Hyper-Fast Charging

Since Electrify America's founding, we have focused on building an inclusive and open fast charging network to help facilitate the adoption of EVs. Electrify America strongly supports the state's zero emission vehicle (ZEV) goals and the CEC's investments to build out ZEV infrastructure. Deploying DC fast charging is the best way to future-proof the network and ensure equitable access to charging, and we believe it is the most important element to support a successful ZEV transition in California. As such, state funding provides crucial support to investments in ZEV infrastructure.

Electrify America appreciates the role of DC fast charging in the Investment Plan. The February 2024 *AB 2127 Second Electric Vehicle Charging Infrastructure Assessment* report identifies an alternative "gas station model" scenario, which assumes more DC fast chargers could meet a larger share of future charging needs, given current drivers prefer fast charging, especially those who do not have access to at-home chargers or who drive far distances.¹ We urge that the CEC utilize the "gas station model" as a metric when prioritizing investments to ensure the availability of high-powered, hyper-fast charging infrastructure capable of delivering at least 350 kW to serve light-duty ZEV needs. The gas station model approach aligns with findings from UC Davis and Next 10's 2024 report, *Analyzing the Business Case and*

¹ Davis, Adam, Tiffany Hoang, Thanh Lopez, Jeffrey Lu, Taylor Nguyen, Bob Nolty, Larry Rillera, Dustin Schell, Micah Wofford. 2023. Assembly Bill 2127 Second Electric Vehicle Charging Infrastructure Assessment: Assessing Charging Needs to Support Zero-Emission Vehicles in 2030 and 2035. California Energy Commission.



*Consumer Preferences for Fast Chargers in California*². Their research into EV driver behavior and DC fast charging preferences revealed that increasing charger utilization is critical, and is best achieved through faster charging speeds, higher charger density per location, and co-location with amenities. Integrating hyper-fast charging into a gas station-type design responds to consumer preferences for faster charging speeds, shorter wait times, accessibility, and provides a network aligned with industry trends where new ZEVs are increasingly offering more range and accommodating faster charging speeds.

Support funding for light duty infrastructure

Electrify America is overall supportive of the proposed funding allocations for light duty infrastructure in the Investment Plan, and we were encouraged to see additional funds being proposed in fiscal years 2025-2026 and 2027-2028³. Electrify America urges the CEC to ensure that these proposed appropriations from the General Fund and Greenhouse Gas Reduction Fund are carried out, in the full proposed amounts. As California nears closer to its 2030 and 2025 ZEV adoption targets, we urge that the state continue to support funding for light-duty charging infrastructure to meet current and future customer demand for passenger EVs.

Separately, Electrify America strongly supports ongoing and committed funding for the CALeVIP program. Each CALeVIP project provides crucial incentives for the purchase and installation of electric vehicle infrastructure in specific regions throughout the state. We have been a recipient of CALeVIP block grant funding, and appreciate the collective efforts undertaken by the Center for Sustainable Energy and the CEC. For future CALeVIP funding solicitations, we strongly urge the CEC to provide a consistent, steady flow of funding, along with information on which specific geographic regions the CEC intends to prioritize. Ideally, releasing funds on a consistent timeline (e.g., twice per year in consistent quarters) would allow more strategic planning by the EV charging industry to maximize the reach of public funding. The CEC may also consider longer award timeframes as the industry builds larger format stations. This will provide additional time for industry to secure the necessary requirements, along with mitigating risks that may arise during the site easement, site design and the energization process. Coupling consistent funding cycles with longer award timeframes would allow public funding to support the build out of a robust charging network that helps achieve the state's transportation electrification goals.

Support targeted investments

Lastly, Electrify America is supportive of the targeted solicitations in the Investment Plan, especially those that target high-priority or underserved communities.⁴ As stated above, DC

² Scott Hardman, Alan Jenn, Debapria Chakraborty, David Bunch. 2024. [Analyzing the Business Case and Consumer Preferences for Fast Chargers in California](#). UC Davis and Next 10.

³ CEC: Public Meeting of the Advisory Committee for the Clean Transportation Program Investment Plan: Slide 37, "Estimated Future General Fund and GGRF Allocations" projecting \$140M in 2025-2026, \$80M in 2026-2027 and \$219M in 2027-2028.

⁴ CEC: Public Meeting of the Advisory Committee for the Clean Transportation Program Investment Plan: Slide 24 "Target Solicitations"



fast charging fundamentally supports customer preference and ZEV adoption. We encourage the CEC to continue targeting investments in these communities, to ensure that all Californians have equitable access to DC fast charging.

Conclusion

Electrify America appreciates the opportunity to comment on the CEC's Investment Plan and supports the CEC's ongoing work to accelerate the transition to EVs in California. We look forward to working with Staff on ensuring light-duty funding is prioritized for DC fast chargers, along with ensuring greater certainty for future CALeVIP funding.

Sincerely,

/s/

Rhiannon Davis
Director of Government Affairs
Electrify America, LLC