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CalETC's Comments on SB 1000 Workshop

Additional submitted attachment is included below.

December 23, 2024

California Energy Commission
715 P Street
Sacramento, CA 95814
Re: Docket No. 20-TRAN-02

Submitted electronically to https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=20-TRAN-02

Re: Staff Workshop on SB 1000 EV Charging Infrastructure Deployment Assessment

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the Staff workshop on SB 1000 Charging Infrastructure Deployment Assessment (Assessment). CalETC would like to thank the CEC for all your hard work on the proposed Assessment of barriers to home charging and its effect on the wider charging ecosystem.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, and other industry leaders supporting transportation electrification.

CalETC recommends adjusting the modeling assumptions to incorporate the California Green Code (CalGreen Code) requirements for residential EV charging. The updated code includes requirements for new multifamily homes (MFH) to include EV charging for 100% of residents that are provided a parking spot. While it will take time for new MFH to be built, this is still an important change that will have an impact on access to charging at MFH. CalETC also recommends considering an adjustment based on the percent of MFH residents served through assigned parking (1 charger for 1 resident) and attributing a value to shared chargers. Sharing chargers is not ideal but it is likely to be a reality for some EV drivers as access to charging continues to grow.

We recommend the CEC add a scenario or scenarios to the model that includes Level 2 charging and adds expanded access to Level 1 and Low Power Level 2. Lower power charging helps increase access to charging in existing single-family homes (SFH) and MFH by reducing the cost of installing charging and reducing the need for utility side upgrades. The CEC is assuming that homeowners with 100A or 125A homes will experience moderate impacts to electrification. However, research and design guidelines by Peninsula Clean Energy (PCE) show that whole-home

electrification, including EVs, is readily achievable for homes with 100A panels.[1] Additionally, PCE's research has shown that Level 1 charging would meet about 95% of everyday drivers' needs.[2] Thus the assumption that Level 1 will only work for 80% of drivers is likely too low.

CalETC recommends working with utilities and charging service providers to improve the accuracy around the assumptions for home charging because the ICCT assumption from 2019 that 68% of SFH home charging occurs on Level 2 power is likely too high. PCE's telematics managed charging pilot showed that over 50% of EV drivers (almost entirely SFH) were charging at less than Level 2 speeds (a mix of Level 1 and Low Power Level 2). These drivers were mostly if not all early adopters in the heart of Silicon Valley. Thus, we believe it is safe to assume that the percentage of Level 2 charging at home will either decrease or stay around 50% as EV adoption becomes more mainstream and enters customer segments that are less willing to pay for installing a charger at home. Adjusting this percentage could be addressed in a separate modeling scenario.

CalETC recommends citing sources and expanding the discussion regarding access to charging in rural areas. Slide 30 and 31 show that access to charging in rural areas is nearly the same as access to charging in urban areas. The is somewhat surprising to learn and it would be great to understand better how the modeling found this result. Additionally, we recommend the definition of neighborhood charging be adjusted to consider charging availability within both 1 and 2 miles of the driver's home, as 2 miles may be too far to travel for charging.

Thank you for your consideration of our comments. Please do not hesitate to contact me at kristian@caletc.com should you have any questions.

Kind regards,

Kristian Corby, Deputy Executive Director
California Electric Transportation Coalition

[1] See slide 6, *Design Guidelines for Home Electrification*, Peninsula Clean Energy, Available at https://www.peninsulacleanenergy.com/wp-content/uploads/2024/07/Design-guidelines-for-home-electrification-v051724.pdf.
[2] *Commute & Multifamily EV Charging Level Needs Analysis*, Peninsula Clean Energy, Available at https://www.peninsulacleanenergy.com/wp-content/uploads/2021/09/Determining-the-Appropriate-Level-of-Power-Sharing-for-EV-Charging-in-Multifamily-Properties.pdf.