

DOCKETED

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Electrify America Comments on SB 1000 Workshop - EV Charging Infrastructure Deployment Assessment

Additional submitted attachment is included below.



December 23, 2024

Tiffany Huang
California Energy Commission
715 P Street
Sacramento, California 95814

RE: Electrify America Comments on SB 1000 Workshop - EV Charging Infrastructure Deployment Assessment

Dear Tiffany:

Electrify America appreciates the opportunity to comment on the SB 1000 Workshop and the preliminary findings of the analysis. Electrify America is the nation's largest open network of DC fast chargers (DCFC) for electric vehicles (EVs), with over 4,250 ultra-fast chargers across 950 locations around the country, and over 1,190 chargers across more than 260 locations open to the public in California. With 56% of our California charging stations located in underserved and low-income areas, we are committed to making EV charging accessible to all California communities. Electrify America is committed to building a future where EV charging is approachable, accessible, and powered by a network drivers can depend on.

Fast Charging Advances Equity

Electrify America strongly supports the state's transportation electrification goals and objectives of SB 1000 to increase access to EV infrastructure in all California communities. We are pleased to see that the scope of this third SB 1000 assessment emphasizes DCFC charging as an important tool for increasing charging accessibility for all Californians. This aligns with the intent of SB 1000, which states that, "Charging speed is a critical component of access and should be considered in public investment strategies related to electric vehicle charging infrastructure."¹ We fully agree and believe that building out a robust DCFC network is critical to enabling mass adoption of EVs across all socioeconomic groups.

For example, research from UCLA² supports this position, showing that multi-unit dwelling (MUD) residents—who are often lower income and more ethnically diverse than the average population—rely on fast chargers as their primary charging source. Their research found that MUD residents use public fast chargers for 43% of charging, more than twice as often as home charging and nearly three times as often as public Level 2. Serving MUD residents and those without home charging access through public ultra-fast charging is an effective way to serve more EV drivers than public Level 2 charging. These findings underscore the critical role

¹ https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB1000

² UCLA Luskin Center for Innovation. 2021. "[Evaluating Multi-Unit Resident Charging Behavior at Direct Current Fast Charging](#)"

DCFC infrastructure plays in ensuring equitable access to EV charging, and we encourage the CEC to continue evaluating the expanding role that DCFC plays in California's EV future, and to prioritize funding and incentive programs for DCFC deployment.

Larger Format Sites Should Be Assessed

One important aspect missing from the assessment is the role that larger format charging stations can play in supporting the State's transportation electrification goals. Electrify America is deploying larger format stations, to support the growing EV market, with sites with as many as 20 charging ports in San Diego, San Francisco and another coming online soon in Central California. These sites support a preferred charging experience, with access to a wide array of amenities, and are an important element of Electrify America's efforts to meet current and future charging demand. They also support drivers' preference for faster charging, especially among those who lack access to at-home chargers or frequently drive long distances. This alternative approach aligns with research by UC Davis,³ which found a significant increase in charger utilization when chargers operate at faster speeds, have higher charger density per location, and are co-located with other amenities. We urge CEC staff to evaluate the role of DCFC in larger format charging stations in future assessments to better understand current consumer preferences, potential benefits and economies of scale associated with larger format stations and ensure the development of an equitable charging network.

Feedback on Workshop Assumptions

Regarding the assessment's methodology, we seek clarity on the rationale behind the 2-mile threshold, particularly as it relates to housing proximity. While we recognize the importance of the 2-mile benchmark for homes, we believe it is equally crucial to consider this distance in relation to frequently visited locations such as work, grocery stores and town plazas. Accounting for access to DCFC in proximity to frequent destinations is an important aspect of determining access to charging for all communities.

We also request clarification on the assumption that 1 DCFC can serve 30 EVs. Electrify America stations see a wide array of usage that may not support the 30-per day assumption. The number of vehicles a charger can serve in a day will depend on charging speed, format of the station (e.g., larger format stations can reduce queuing times), attributes like Electrify America's state of charge pilot⁴, and several factors dependent on location – including travel pattern, proximity to amenities, perceived safety, and other considerations. It will be important to thoughtfully forecast the DCFC to EV ratio that achieves an optimal level of utilization and equitable deployment of chargers across California's communities. We look forward to working with the CEC on this important distinction.

³ UC Davis and Next 10. 2024. [Analyzing the Business Case and Consumer Preferences for Fast Chargers in California.](#)

⁴ <https://www.electrifyamerica.com/soc-pilot/>

Conclusion

Electrify America remains committed to partnering with the CEC to advance California's transportation and climate priorities, and we look forward to continuing to work with CEC staff regarding the SB 1000 report. Thank you again for the opportunity to comment and engage in this process.

Sincerely,

/s/

Rhiannon Davis

Director of Government Affairs
Electrify America, LLC