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## **GoPowerEV Comments on Docket No 20-TRAN-02**

Additional submitted attachment is included below.



## GoPowerEV

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Jan 3, 2025

California Energy Commission Docket Office 715 P Street Sacramento, CA 95814-5512 Docket@energy.ca.gov

## Re: GoPowerEV Comments on Docket No. 20-TRAN-02, SB1000 EV Charging Infrastructure Assessment

## California EV Charging Programs Urgently Need to Focus on Most Economical, Scalable and Equitable EV Charging Solutions

Dear Advisory Committee members,

GoPowerEV, a California-based provider of cost-effective multi-family housing EV charging, appreciates the opportunity to provide comments to the California Energy Commission (CEC) staff. Adoption of EVs among residents of multi-family housing lags behind adoption by residents of single-family homes. GoPowerEV is part of the CEC REACH 2.0 program—we are well on the way to implementing over 1000 of the lowest-cost home charging ports for residents of affordable housing.

Convenient charging at home is the most significant obstacle to EV adoption. Studies by JD Power and the US DOE indicate that, when EV drivers have access to home charging, then 90% of all miles are charged at home because it is cheaper and more convenient to charge overnight while sleeping.

CEC is urged to promote subsidies and adjust the CTP to improve EV charging incentives for "low-power Level 2" (LPL2) charging as well as L1 charging. Many policy makers erroneously believe that charging must be as fast as possible. LPL2 is great for the following reasons:

- It provides 130-160 miles of range in an overnight charging session, which can meet over 97% of daily driving needs.
- LPL2 can be implemented at a fully installed cost of \$2000-\$3000 per port, about 75% cheaper than L2 at 40/50A. The savings stem from the utility panel, the conductors and conduit, and the amount of labor time required.
- Lower cost allows more ports for the same investment. Residents do not have to share, do not have to move their cars, and do not have to pay idle fees.
- LPL2 generates lower peak demand for the utilities, which makes installation permit approvals quicker and further reduces cost.

Recommendations:

- *REACH 3.0 rules should be updated to (continue to) include subsidies for LPL2 charging at 3.6kW, not just 7kW charging.*
- The CALeVIP program has been a hindrance to ubiquitous adoption of convenient charging with its focus on 7 kW, shared Level 2 installations. *CALeVIP must be modified to support LPL2 installations*.
- For affordable housing properties, *subsidies should be able to cover the first four years of networking, maintenance, and communications.* This will increase property owner adoption, since they have minimal ability to absorb ongoing costs or to pass these fees to residents, who may have not yet purchased an EV.
- The CEC should urge utilities and CCAs to expedite approvals, and to quickly respond to

information requests about transformer capacity and service drops.

- Many utility and CCA subsidy programs limit the number of charging ports on a property to ~10 ports. This is inadequate for properties with 100s of apartment units. Landlords are reluctantto implement charging that will leave their residents arguing with each other over access to a few shared resources. The CEC should urge utilities and CCAs and municipalities and AQMDs to support at least 40% of apartment units with a charging port.
- Most utilities treat charging services at residential multi-family housing under their commercial rules and tariffs. This means the usage fees are higher, and the rules for the electrical distribution panels are very strict, requiring for example that service continues uninterrupted if the utility needs to pull a meter for inspection or replacement. These commercial electrical panels—with an integrated test bypass—cost twice as much as residential panels and often have 6-12 month ordering lead times from suppliers. *The CEC should urge the utilities to review their rules for electric panels, for a panel that is exclusively supporting residential home charging*.

Sincerely,

John Reister CEO GoPowerEV Inc.