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## **Comments on 24-TRAN-03**

### **1) Charger requirements at Multi Unit Housing:**

Requiring charging infrastructure in MUH and especially providing state aid to bring charging to MUH in communities of need is very important. However, requiring all of this charging to be Level 2 will be counter productive. While a Level 1 charger will not charge an EV from zero to full overnight it will easily provide 30 miles of range overnight and this is the average commute. This will serve the needs of most residents. DC fast chargers should be viewed as supplemental not the main source of charging.

### **2) Workplace Charging:**

Since one of the goals in all energy planning must be to reduce the CO2 content of electricity, planning should encourage daytime charging over nighttime charging. This suggests that workplace charging should be a top priority in planning. Emphasising workplace charging in establishments that employ low wage workers will also be a way to provide charging for some residents of MUH without having to upgrade electrical service to the MUH. Because of the long dwell time, workplace charging lends itself to load management much better than the load at the gas station DC fast charger model.

### **3) Distributed Chargers:**

Rather than encouraging large charging plazas that will require new utility connections the state should look to extend the charger count as far as possible with distributed charging installations that use the existing grid. The model proposed by itsElectric <https://www.itselectric.us> is an example of this.

### **4) Bidirectional Charging:**

It is almost certain that by 2033 when the CEC projects that EVs will represent 50% of vehicle miles traveled most of them will be capable of bidirectional charging, that is V2G. The plans described in this docket make no mention of V2G, nor does the staff report. There is a risk that if future technology is not considered in planning that extends into the future much of this investment will be sunk costs in equipment that is obsolete almost as soon as it is installed.

For all of the reasons above we strongly recommend against the Increased DC Fast Charger Funding Scenario. Although it reduces the number of chargers, the individual chargers are much more expensive and the utility make-ready costs and time will be much greater.

We have one final comment on the distribution of funding between H2 filling stations and EV charging stations. We note that currently there are 1,115,708 EVs in CA and 13,988 fuel cell vehicles, a ratio of 83 times. The proposed funding ratio is 4.9. Given the huge disparity in vehicle population it seems hard to justify spending 17 times more per vehicle on fuel cell vehicles.