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NEMA Comments- Docket #24-TRAN-03 2024 Zero-Emission Vehicle Infrastructure Plan

Additional submitted attachment is included below.

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BY ELECTRONIC FILING

February 7, 2025

Staff
California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket #24-TRAN-03- NEMA Comments on California Energy Commission (CEC) 2024 Zero-Emission Vehicle Infrastructure Plan: Deployment Strategy 2025 to 2030

To Whom it May Concern:

The National Electrical Manufacturers Association ("NEMA"), on behalf of its members, respectfully submits the following comments in response to the California Energy Commission (CEC) Zero-Emission Vehicle Infrastructure Plan: Deployment Strategy 2025 to 2030.

About NEMA

NEMA represents over 300 electrical equipment manufacturers that make safe, reliable, and efficient products and systems. Together, our members contribute 1% of U.S. GDP and directly provide nearly 460,000 American jobs, contributing more than $250 billion to the U.S. economy. Our members produce goods for the grid, industrial, built environment, and mobility sectors. The electroindustry is a key driver of infrastructure development and future economic growth. NEMA members are leading producers of equipment for the mobility market, including electric vehicle ("EV") chargers and charging infrastructure, motors, inverters, and power control and distribution components.[1]

NEMA's Electric Vehicle Charging Equipment Manufacturers represents companies that are currently selling, manufacturing, and operating in North America. Electric vehicle charging infrastructure is not comprised of hardware alone. Rather, it represents a combination of hardware, software, cables and cable management, and analytics integrated into a network that delivers energy safely, reliably, and efficiently to a vehicle.

NEMA is strongly in favor of the efforts to deploy and sustain a nationwide electric vehicle charging infrastructure to support the increasing number of consumers who are choosing EVs. This deployment should strive towards standardization and interoperability and allow for communication and coordination between the vehicle, the charging station, and grid operator to maximize the benefit and convenience for vehicle owners, while not putting overdue stress on the distribution system.

[1] Additional information about NEMA may be found at https://www.nema.org/.

Summary

Greenhouse gas and criteria pollutant emissions from transportation are significant contributors to the climate crisis and to negative health consequences, especially in low-income and disadvantaged communities. Zero-emission vehicle (ZEV) charging and hydrogen fueling infrastructure are critical to meeting California's clean transportation goals. Infrastructure investments increase access and equitable adoption and accelerate the transition away from fossil fuels. The first Zero-Emission Vehicle Infrastructure Plan (ZIP) documented the state's near-and long-term actions to ensure that zero-emission vehicle infrastructure deployment will meet the needs of the growing zero-emission vehicle market. This second Zero-Emission Vehicle (ZEV) Infrastructure Plan describes a deployment strategy for Clean Transportation Program funding.

CEC staff is issuing this request for information (RFI) to assist in gathering information from interested members of the public, stakeholders, and others to inform this strategy. Specifically, the ZEV infrastructure plan requests input on whether the CEC should continue pursuing the AB2127[2] funding scenario or the increased DC Fast Charging ("gas station model") alternative scenario.

Comments

NEMA agrees that the Clean Transportation Program has been essential to making California a leader in Zero-Emission Transportation. Public and private funding is key to supporting the growth of ZEV infrastructure across the state. NEMA notes that a key component in the development of guidance for EV charging infrastructure deployment is the incorporation of EV Ready and EV Capable requirements into both commercial and residential building and energy codes. NEMA has been instrumental in getting these requirements incorporated into the 2024 IECC Code and has targeted several states and jurisdictions across the country for its adoption including its optional appendix on EV-Ready provisions. NEMA is also an active participant in the California Green Building Standards Code activity.

NEMA recommends that the CEC continue pursuing the primary AB 2127 funding scenario for LD passenger EVs. Under this scenario the following strategy would be implemented.

- Prioritize Level 2 deployments serving multifamily households
- Prioritize DC fast charging in rural areas of the state
- Prioritize increasing the presence of DC fast charging to meet equity needs
- Prioritize harder to reach workplaces and commute destinations (where drivers live in one region and commute to another region for work)

It's recognized that as EV growth continues to expand, EV charging at residential and multifamily dwellings is critical. Most EV drivers charge at home, and having widely accessible L2 charging can decrease overall system costs for the distribution grid by allowing for better load management by spreading out electricity usage throughout the day. Also, encouraging residents to charge their vehicles during off peak hours when demand is lower can reduce strain on the grid during times of peak demand.

[2] https://www.energy.ca.gov/data-reports/reports/electric-vehicle-charging-infrastructure-assessment-ab-2127

Rural areas need DC fast charging stations to support longer driver tips and reduce range anxiety. Installing DC fast charging stations in rural areas can also attract travelers that bring revenue to local businesses. DC fast charging in low-income communities can help ensure equitable access to EVs. Without the adequate infrastructure, these communities may be left behind as the number of EVs on the road increases. Finally, by prioritizing L2 chargers at harder to reach workplaces, employers can help increase the convenience and affordability of driving electric for their employees and unlock EV adoption for drivers who may not have charging at home.

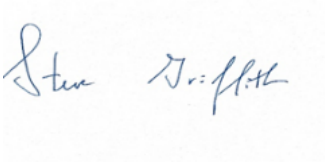
The challenge of a "gas station model" for EV charging is that it may lead to greater demands on the electric grid and subsequently, higher electricity costs. There is additional grid capacity planning to consider including any needed distribution-level equipment to help manage the power. Utility engagement is also key to ensure they can support the increased grid capacity under an increased DCFC scenario with reasonable energization timelines. It is important to consider what the impact will be to fuel costs for EVs and how higher electricity costs could negatively impact EV adoption.

Finally, it is important to recognize that for multifamily properties and workplaces, L2 charging is more of an amenity than a core business function. This means such entities are highly cost sensitive when it comes to a discretionary project such as installing L2 chargers. NEMA recognizes that L2 programs are more challenging to implement, as there are more chargers that need to be installed and more stakeholders to incentivize. We encourage the CEC to focus on identifying ways to ease participation in L2 programs for multifamily and workplaces, such as by simplifying administrative/data reporting requirements to access funds and reviewing technical requirements applicable to publicly funded chargers serving these use cases. By reviewing and simplifying these requirements, CEC may allow lower cost L2 equipment to be eligible, decrease overall cost of installation, and increase program participation.

Conclusion

NEMA respectfully requests consideration of our comments and recommendations, and we look forward to working with the CEC on its ZEV infrastructure strategy implementation. Should you have any questions or need any additional information, please contact me at (703) 307-7847 or steve.griffith@nema.org.

Sincerely,



Steve Griffith
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