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**EVgo Comments on 2024 Draft Zero-Emission Vehicle
Infrastructure Plan Workshop**

Additional submitted attachment is included below.

February 7, 2025

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket No. 24-TRAN-03 – 2024 Draft Zero-Emission Vehicle Infrastructure Plan Workshop Presentation

Introduction

EVgo appreciates the opportunity to submit comments on the January 29th workshop on the 2024 Draft Zero-Emission Vehicle Infrastructure Plan (ZIP). As one of the nation's largest public fast charging providers, EVgo shares the CEC's vision for an elevated customer experience for electric vehicle (EV) drivers and recognizes that a reliable, widespread EV charging network is crucial for scaling EV adoption needed to help achieve California's equity, clean energy, decarbonization, and air quality goals.

The ZIP provides an important roadmap for the execution of California's policy goals, and EVgo commends the CEC's leadership in accelerating EV adoption through a diverse portfolio of EV charging programs. To ensure that the ZIP positions California for success and accurately reflects market conditions, EVgo makes the following recommendations:

1. Establish durable, predictable, and transparent funding cycles that meet CEC-funded charger deployment targets and will lead to more market certainty and consistent EV charger deployment; and
2. Allocate more funding toward block grants, as opposed to Grant Funding Opportunities (GFOs) to deploy infrastructure at the scale needed to meet state goals.

- 1. Establish durable, predictable, and transparent funding cycles that meet CEC-funded charger deployment targets and will lead to more market certainty and consistent EV charger deployment**

EVgo understands that fluctuations in California's annual budget cycles can create uncertainty around the level of funding CEC has available to support its portfolio of EV charging programs. At the same time, a simple, predictable, and durable cycle of future solicitations for the CEC's EV charging funding initiatives – especially block grants – would support more efficient capital

planning and submission of high-quality projects that meet CEC's specifications as well as state infrastructure needs through 2030. Moreover, transparent scheduling creates more market certainty that will lead to more consistent deployments of charging infrastructure as envisioned in 2025-2030 EV charging infrastructure forecasts in the ZIP.

Other best in class state infrastructure programs provide this certainty, and California should follow the lead of these other states. For example, Colorado Energy Office's *Charge Ahead Colorado* EV charging grant program provides three standard application funding rounds annually in January, May, and September.¹ Similar program cycles are and will continue to be a necessary component of CEC's overarching strategy to support California's nation-leading EV charger deployment goals.

2. Allocate more funding toward block grants, as opposed to GFOs, to deploy infrastructure at the scale needed to meet state goals

Appendix A of the ZIP assumes 55% of annual light-duty CEC funding is allocated toward block grants while the remainder is dedicated to targeted solicitations or GFOs.² EVgo recommends that CEC direct a greater share of funding toward block grants that are better designed to deploy charging infrastructure at the scale that California's EV goals demand. As noted in the CEC's 2024-2025 Investment Plan Update for the Clean Transportation Program, "[b]lock grants are important tools to rapidly deploy funds to support infrastructure deployment."³ CEC also notes that while GFOs provide the agency with the ability to pursue more targeted infrastructure solutions, this type of funding mechanism "also requires significant time and attention to review each application and oversee each subsequent funding agreement."⁴

These statements are substantiated by recent CEC solicitations: whereas GFOs like FAST 2.0 may require at least two quarters between application submission and agreement execution with the CEC⁵, previous block grant solicitations like CALeVIP 2.0 would notify applicants of their funding status within three months or less and allow applicants to build at risk following the closure of the application window.⁶ Furthermore, the CEC's latest round of CALeVIP 2.0 will

¹ <https://energyoffice.colorado.gov/charge-ahead-colorado>

² ZIP at A-2.

³ 2024-2025 Investment Plan Update for the Clean Transportation Program at 43, <https://www.energy.ca.gov/publications/2024/2024-2025-investment-plan-update-clean-transportation-program>

⁴ *Id.* At 15.

⁵ <https://www.energy.ca.gov/solicitations/2024-12/gfo-24-607-fast-20-fast-and-available-charging-all-californians>

⁶ <https://calevip.org/sites/default/files/docs/golden-state-priority-project-north-south/gsp2-implementation-manual.pdf>

review and approve application on a rolling basis, which may allow for EV charging providers to develop shovel-ready projects on an even faster timeline to meet state goals.⁷

While certain market segments may benefit from more targeted solicitations, including rural communities, the CEC should leverage its extensive experience implementing EV charging programs to rapidly scale charging in high demand segments. Of the DCFC segments that CEC assessed in the ZIP, urban/metro fast charging is by far the largest in terms of both i) overall ports needed and ii) proposed CEC-funded ports – approximately 6,000 ports between 2025 and 2030.⁸ The magnitude of ports needed to meet 2030 demand in this segment demands an efficient, scalable funding mechanism, and EVgo maintains that block grants like CALeVIP 2.0 are best positioned to maximize CEC’s investments in fast charging infrastructure. Since CEC introduced key enhancements in 2023 to improve program efficiency, including a tiered application system that encourages shovel-ready projects, CALeVIP 2.0 has become more effective at supporting the deployment of larger, more convenient fast charging stations.

Conclusion

EVgo commends the CEC for developing the 2024 ZIP and recognizes that the level of ambition in California’s transportation electrification goals requires efficient, innovative approaches to achieving a widespread and convenient EV charging network. By providing greater transparency around funding cycles, dedicating more funding toward scalable block grants, and supporting the upgrading of legacy charging infrastructure, the CEC can enable the state to achieve these goals. EVgo looks forward to being a resource as the CEC executes the ZIP.

Respectfully submitted this 7th day of February, 2025,

Noah Garcia
Manager, Market Development and Public Policy
EVgo Services, LLC
11835 W. Olympic Blvd., Suite 900E
Los Angeles, CA 90064
Tel: 310.954.2900
E-mail: noah.garcia@evgo.com

⁷ <https://calevip.org/sites/default/files/docs/fast-charge-california-project/fccp-implementation-manual.pdf>

⁸ ZIP at 38-40. <https://www.energy.ca.gov/sites/default/files/2025-01/CEC-600-2025-002.pdf>