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Joint Letter - GRID Alternatives, Ecology Action, et al - 2024 Zero-Emission Vehicle Infrastructure Plan

Additional submitted attachment is included below.



EV CHARGING
FOR ALL
COALITION

National Charging For All Coalition



February 7, 2025

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

VIA DOCKET

Energy Commission Docket **24-TRAN-03**

Re: Comments on the 2024 Zero-Emission Vehicle Infrastructure Plan

Dear Commissioners and Energy Commission Staff:

The undersigned organizations and coalitions appreciate the opportunity to submit the following comments regarding the 2024 Zero Emission Vehicle Infrastructure Plan and the presentation conducted on January 29th. Collectively, we have deep issue area knowledge regarding the sustainable and equitable transition to transportation electrification, including both policy development, regulation, and extensive experience in increasing access to electric vehicles, EV charging stations and battery storage deployment for income-qualified families, multifamily housing owners and community facilities in economic and environmental justice communities.

In response to the Commission's "Questions for Consideration (EV)" on slide 37, we strongly encourage staff to go the direction of the first investment scenario presented, **the Primary AB2127 Funding Scenario**, which will prioritize investments that increase Level 2 chargers at multifamily housing sites and harder to reach workplaces and commute destinations, as well as increase DC fast chargers for rural areas and low-income and disadvantaged communities.

One of the most consistent issues that we have observed with DC fast charging public investments intended to benefit low-income EV drivers is that these projects are largely used by higher income customers who are simply *passing through* underserved communities. These investments promote an electrification transition generally, but do not meet the specific needs of low-income households in

underserved communities. Studies show that many underserved communities consist of renters that will depend on public charging that can cost up to 6 times more than charging at home.¹ Therefore, we support the AB2127 Funding Scenario on the basis that there would be continued substantial investments for multifamily housing sites, where residents are more likely to be able to afford to charge their vehicles. Future funding solicitations should incentivize and prioritize projects **built specifically for local low-income residents and community members**, where additional points can be allocated to applicants that demonstrate that their project is not only located in a designated DAC or low-income community in an urban or rural area, but sited at a location that will directly serve that target community.

With regards to investing in DC public chargers, actual financial accessibility for community members must be considered. Much of the public charging available in frontline communities is not financially accessible to community members, and is therefore not providing the intended equity benefit, since it is typically more expensive to charge at a public charger than at home. We ask the CEC to carefully consider whether publicly available charging in any given community is equitably accessible to current or potential EV drivers living in that community. A portion of this funding could be dedicated to supporting equitable access to charging infrastructure for drivers who live in the identified priority community. Programming around subsidized access to public charging and public charging credits are an integral step towards increasing access to EVs in an equitable manner.

Lastly, given the efficacy of Level 1 and Low Power Level 2 charging, we would encourage the CEC to include them as funded options particularly for multifamily housing and the workplace. As the CEC is likely aware, Title 24, Part 11, (CALGreen) has taken this approach for new and retrofitted multifamily housing.

Thank you for your consideration of our input. We look forward to collaborating with the Commission to ensure that low-income and disadvantaged communities in urban and rural areas of California have robust and equitable access to electric vehicle charging infrastructure.

Sincerely,

Linda Khamoushian
Senior Clean Mobility Strategist
GRID Alternatives

Lauren Weston
Executive Director
Acterra: Action for a Healthy Planet.

Emma Searson
Managing Policy Director
GRID Alternatives

Vanessa Warheit
Project Director
National Charging for All Coalition (NCAC)

Brenda Hopewell
Senior Director, Transportation Electrification
Ecology Action

¹ Lipman, Kandhra, MacCurdy. 2024. Multifamily Households Across California are Paying a Lot More to Charge Their Electric Vehicle. <https://escholarship.org/content/qt9dn2j441/qt9dn2j441.pdf?t=slhysv>