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CalETC's Comments on the 2024 Draft ZIP Update

Additional submitted attachment is included below.

CalETC
California Electric Transportation Coalition

February 7, 2025

California Energy Commission
Docket No. 24-TRAN-03
715 P Street Sacramento, CA 95814

Submitted electronically to https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=24-TRAN-03

Re: Draft 2024 Zero-Emission Vehicle Infrastructure Plan

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the Draft 2024 Zero-Emission Vehicle Infrastructure Plan (ZIP). CalETC would like to thank the CEC for all your hard work on developing the ZIP and your commitment to developing equitable, reliable, and ubiquitous zero-emission charging and hydrogen fueling networks across the state.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, and other industry leaders supporting transportation electrification.

CalETC supports the ZIP and we applaud the CEC for putting together this overarching strategy document to help focus and coordinate all of the great work you are doing on ZEV infrastructure. At the same time, we are concerned that California is not on track to meet its charging infrastructure goals. California has a goal to install 250,000 chargers by 2025 and we currently have just over 152,000 public and shared private chargers.[1] The CEC's Second AB 2127 Report calls for 1.01 million chargers to be installed by 2030 and CalETC's own assessment puts that number between 4 and 6 million chargers.[2] We recognize that the CEC's current charger count does not include chargers in private residences, which should be included in the total number of chargers needed. Regardless, we need major changes in the way we plan for and build charging

[1] On February 4th, 2025, the CEC's electric vehicle charger count was 152,356. See https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics/electric-vehicle.
[2] *The Infrastructure Needs and Costs for 5 Million Light-Duty Electric Vehicles in California by 2030*, June 1, 2020, CalETC. Available at: https://caletc.com/assets/files/EV-infrastructure-study-white-paper-FINAL.pdf.

infrastructure and the associated grid infrastructure to meet our charging goals, including a sustained focus on addressing barriers to VGI, accelerating managed charging, and addressing the grid planning and investment challenges associated with uncertain location, magnitude, and timing of EV load. We thank the CEC for their continued leadership in facilitating the deployment of EV charging infrastructure and hydrogen refueling stations and encourage the CEC to complete the EV charger inventory, utilization, and reliability regulations as soon as possible, which will improve reliability of EV charging stations and grid planning and forecasting.

CalETC recommends prioritizing DCFCs in the near term and maintaining funding for L2 at multifamily housing and workplaces. Ultimately, we will need all types of charging to achieve our goals, however, to spur mass market adoption we must build confidence among users that a ZEV can complete all their trips, even those that require DCFC. DCFC must be widely available to satisfy immediate charging needs across a diversity of use cases, including ride-share, long-distance trips, high milage daily drivers, and multifamily residents with limited or no access to home charging. A public DCFC station inherently supports all potential EV customers who may need to travel in that region. While DCFC is more expensive to install than L2 on a charger-by-charger basis and may require additional grid planning to ensure sites can be energized, the CEC's analysis shows DCFCs have a stronger business case in the near term. Typically, DCFC is more expensive for drivers, so it is imperative that California continue to build on solutions to enhance the affordability of fast charging for income-qualified EV drivers that may not have access to charging at home, including the $2,000 charging card that is part of CARB's rebate and assistance programs and the California Integrated Travel Project's Universal ZEV Equity Charging Card.[3]

L2 is effective for longer dwell time charging at workplace, curbside, commercial, or residential locations. There are barriers that need to be overcome to install widespread charging at existing multifamily housing, but it is imperative to overcome those barriers so multifamily housing residents can take advantage of low-cost charging on residential rates. The ZIP shows that the California Green (CalGreen) Code will help by requiring the installation of L2 and low-power L2 (20-amp receptacles) in newly constructed multifamily housing, totaling over 160,000 chargers by 2030. Longer dwell time charging provides opportunities to use automated load management systems (ALMS) to improve charging performance and reduce the upstream impacts to the grid.

CalETC recognizes that the year-to-year budget cycles create uncertainty for the CEC's long-term funding plans and efforts to clearly allocate funding from the Clean Transportation Program funds reauthorized by AB 126 (2023). That said, CalETC strongly urges the CEC to provide clear, long-term schedules for workshops and solicitations for your signature block grant programs. The "start/stop" nature of some infrastructure incentive programs, including CALeVIP and Communities in Charge, leads to market uncertainty for both investors and charging station providers at a time when we need to rapidly accelerate construction and energization of new

[3] *Valley CAN and the State of California issue preloaded, reloadable contactless debit cards for low-income EV owners to use at any charging station*, CalITP, August 1, 2022, available at https://www.calitp.org/press/valleycan-preloaded-reloadable-ev-charging.

electric vehicle charging stations. To the extent possible, CalETC recommends setting a schedule for regular funding windows where funding can be annually allocated and verified. By providing clarity on the timing of future funding opportunities charging station providers to plan and scale their investments to meet our shared EV infrastructure goals.

CalETC recommends allocating more funding to the CEC's signature block grant programs to deploy infrastructure at scale, instead of using competitive solicitation for grants. The pace of EV adoption and the state's ambitious goals requires us to use the fastest approach for established charging and hydrogen refueling market segments. The block grant programs are competitive, require submission of significant documentation, and the CEC's third-party administrators scrutinize applications to ensure awards are made to reputable applicants. Even with this thorough oversight, the turnaround for the most recent CALeVIP 2.0 was roughly three months between the application deadline and notice of award.[4] The CEC's funding can be deployed thoughtfully and rapidly through its signature block grant programs to meet our shared charging goals.

CalETC recommends allocating funding to upgrade and replace legacy charging equipment to bolster EVC RAA efforts and enhance EV charging experience for drivers. Many chargers operational today will not be operational in 2030 as they reach the end of their useful life. Targeted competitive solicitations to upgrade and replace legacy chargers may be less costly than developing entirely new charging stations while 1) expanding available charging capacity at a given site and 2) improving the customer charging experience with newer, more reliable equipment. Timing is less of a concern for the upgrade and replacement of existing infrastructure because applicants could apply well in advance of the need for replacement. EVC RAA is helpful, but there is and will be a larger unmet need as more chargers reach the end of their useful life.

CalETC recommends the CEC to include Level 1 EV charging in the Communities in Charge Program. Level 1 can be a very convenient charging option for drivers when there is sufficient parking to allow drivers to charge for long periods of time. Research by Peninsula Clean Energy has shown that Level 1 charging would meet about 95% of everyday drivers' needs.[5] Additionally, Level 1 charging is inexpensive compared to faster charging. Level 2 chargers cost approximately $10,000 per charger, whereas Level 1 chargers are approximately $2,500 per charger. We need to rapidly scale charging infrastructure, and all solutions must be funded to reach our 2030 goals. For these reasons, we encourage the CEC to include Level 1 chargers as eligible equipment in the Communities in Charge Program.

Due to the recent actions by the federal government, CalETC recommends that the CEC include planning scenarios that do not incorporate any additional funding coming from the National

[4] Applications were due December 12, 2023, and awardees were notified by March 4, 2024. See https://calevip.org/incentive-project/gspp-incentive-north-south.
[5] *Commute & Multifamily EV Charging Level Needs Analysis*, Peninsula Clean Energy, Available at https://www.peninsulacleanenergy.com/wp-content/uploads/2021/09/Determining-the-Appropriate-Level-of-Power-Sharing-for-EV-Charging-in-Multifamily-Properties.pdf.

Electric Vehicle Infrastructure Formula Program (NEVI) nor the Charging and Fueling Infrastructure Discretionary Program (CFI). Given that one of the first executive orders released on January 20th from the new federal administration, calls for a 90 day pause to review all funding going toward the Inflation Reduction Act and Infrastructure Investment and Jobs Act activities, and specifically calls into question the NEVI and CFI Programs, it would be prudent for the CEC to run new scenarios that do not rely on those funding streams going forward. Running the scenarios without that funding would provide insight into the impacts of that potential funding loss and the resultant additional gap that would need to be made up.

Thank you for your consideration of our comments. Please do not hesitate to contact me at kristian@caletc.com should you have any questions.

Kind regards,

Kristian Corby, Deputy Executive Director
California Electric Transportation Coalition