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Electric Vehicle Charging Association Comments on the Draft 2024 Zero-Emission Vehicle Infrastructure Plan

Please find attached comments from the Electric Vehicle Charging Association on the Draft 2024 Zero-Emission Vehicle Infrastructure Plan (ZIP). Thank you.

Additional submitted attachment is included below.

February 7, 2025

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

**RE: Docket No. 24-TRAN-03 - 2024 Draft Zero-Emission Vehicle Infrastructure Plan
Deployment Strategy 2025 to 2030**

Dear Commissioners and Staff,

The Electric Vehicle Charging Association (EVCA) appreciates the opportunity to provide comment on the 2024 draft Zero-Emission Vehicle Infrastructure Plan (ZIP) and would like to thank staff for their continued work and leadership in supporting EV charging infrastructure deployment in California.

EVCA is a not-for-profit trade organization of over 20 leading companies within the electric vehicle charging ecosystem, established in 2015 to comprehensively represent the entire EV charging value chain for policymakers throughout the West Coast.

As expressed in previous comments, stakeholders throughout the EV charging ecosystem benefit from predictability and certainty when it comes to California's grant funding opportunities, and we appreciate the role of the ZIP in outlining the Energy Commission's long-term priorities for the Clean Transportation Program. **As the CEC works to implement this funding strategy over the next five years, EVCA would like to encourage the Energy Commission to exercise broad flexibility when administering these funds.**

This includes maintaining a balance of funding across the light-duty and medium- and heavy-duty (M/HD) sectors, accommodating diverse charging models throughout the MHD sector, and prioritizing proven block grant programs over more prescriptive, one-time solicitations.

The charging needs of EV drivers and fleet owners are diverse, and the industry has responded with innovative charging solutions across the light- and medium- and heavy-duty sectors. While these models may meet the unique needs of specific sites and users, they may not always fall neatly within our existing classifications or specifications. EVCA encourages the CEC to consider these varied models as part of a larger, flexible funding approach, articulated through the ZIP. Such flexibility would ensure the market

continues to evolve and enables infrastructure development at the scale needed to meet the state's goals.

To accommodate the various needs of M/HD fleets, **EVCA would encourage the CEC to adopt a definition of “publicly accessible” that is inclusive of shared-use depots and to make shared charging sites eligible within existing grant funding programs.** Shared-use depots are charging depots that are open to multiple authorized commercial motor vehicle operators from multiple companies, commonly referred to as “shared charging.” Shared charging offers a “middle ground” between public and private charging that ensures fleets know what to expect from the charging experience, reducing the uncertainty associated with public stops, and offering an additional pathway for expanded deployment of M/HD charging infrastructure. Many state-level programs are adopting the shared charging terminology in recognition of the unique needs of the M/HD vehicle and charging industry.

Providing equal opportunities for shared, private, and public M/HD infrastructure would improve industry-wide certainty, support the continued development of these emerging supply chains and markets, and provide consistency with other jurisdictions across the nation. An expansive network of public and private chargers will be essential to meeting the diverse needs of M/HD EV operators and better reflect current market realities.

To the extent possible, EVCA would also encourage the Energy Commission to focus on simple, predictable, and durable cycles of future solicitations for the CEC's grant programs. Predictable and reliable funding cycles provide applicants with the certainty and market stability needed for more efficient capital planning and, as a result, the development of higher-quality projects that better meet the CEC's specifications and the state's infrastructure needs.

To deploy chargers at the scale needed to meet California's 2030 ZEV infrastructure goals, EVCA also encourages the CEC to allocate a greater share of funding toward existing block grant programs, rather than special Grant Funding Opportunities. CEC notes in its 2024-2025 Investment Plan Update for the Clean Transportation Program that “[b]lock grants are important tools to rapidly deploy funds to support infrastructure deployment.” While certain segments may benefit from more targeted solicitations, including rural communities, the CEC should leverage its extensive experience implementing EV charging programs to rapidly scale investment in high-demand segments. As stated in the CEC's second AB 2127 assessment, California will need to roughly quadruple its network of chargers in just the next five years. The magnitude of this challenge demands an efficient and scalable funding mechanism, and EVCA would

maintain block grants are best positioned to meet these goals and maximize the CEC's investments.

To improve the overall EV driver experience, EVCA would also encourage the CEC to bolster its efforts under the Electric Vehicle Charging Reliability and Accessibility Accelerator (EVC RAA) program with additional funding for the upgrade and replacement of legacy charging equipment. Because California has been a first-mover in supporting the deployment of EV charging infrastructure for well over a decade, many legacy EV chargers are reaching the end of their useful lives. For this reason, it is important that the CEC not only factor in the lifespan of EV charging infrastructure in its forecasting analyses, but also consider funding the upgrade and replacement of end-of-life charging equipment with newer, more modern infrastructure that aligns with California's goals for a convenient and reliable charging network. CEC and Caltrans' EVC RAA solicitation is beginning to address this issue with the targeted replacement of low-performing, legacy chargers with newer, more reliable equipment; these efforts are completed by EV charging provider initiatives to replace and upgrade first-generation chargers.

EVC RAA is a one-time program, however, and there will continue to be unmet infrastructure needs as more chargers reach the end of their useful lives over the course of the decade. By establishing a targeted effort to replace legacy infrastructure, the CEC may encourage the deployment of upgraded charging stations that align with the state's equity goals, and accelerate private sector efforts to deploy more reliable, next-generation chargers that enable a more seamless charging experience.

In closing, EVCA greatly appreciates the Commission's consideration of stakeholder feedback and engagement throughout the ZIP's development, and we look forward to continuing to engage with the CEC in ensuring California's charging investments are best suited to meet the state's critical climate goals.

Sincerely,

Reed Addis

Governmental Affairs

Electric Vehicle Charging Association