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Electrify America Comments on 25-26 CTP Investment Plan Update

Please see our attached comment letter.

Additional submitted attachment is included below.



May 14, 2025

Benjamin Tuggy
California Energy Commission (CEC)
715 P Street
Sacramento, California 95814

RE: Electrify America comments on the Proposed Clean Transportation Program Investment Plan

Dear Mr. Tuggy:

Electrify America appreciates the opportunity to comment on the updated Clean Transportation Program (CTP) Investment Plan and thanks the California Energy Commission (CEC) for thoughtfully reassessing funding priorities in light of current EV market needs.

Electrify America operates the largest open network of hyper-fast EV chargers in the United States—offering speeds up to 350 kW—including more than 1,200 chargers across 265+ publicly accessible locations in California. Programs like the CTP support expanded investments in EV charging and accelerate growth in the broader electric vehicle (EV) market. Strategic investments at this pivotal moment are vital to sustain EV adoption momentum and reinforce market confidence.

Fast Charging Advances Equity

Electrify America supports the CEC's focus on filling infrastructure gaps identified in the AB 2127 and SB 1000 reports—particularly the need for greater access to DC fast charging (DCFC). We agree with the sentiment expressed in SB 1000, which states that, "Charging speed is a critical component of access and should be considered in public investment strategies related to electric vehicle charging infrastructure."¹ Faster charging supports higher utilization and economies of scale in charging infrastructure, future proofs the network by aligning with trends of faster charging capabilities on new EVs, and increases driver confidence in charging availability by addressing consumer preferences.

We believe that building out a robust DCFC network is critical to enabling equitable EV adoption, especially for disadvantaged and lower-income communities who do not have access to at-home charging. Research from UCLA² supports this position, showing that multi-unit dwelling (MUD) residents—who are disproportionately lower-income—rely on fast chargers as their primary charging

¹ https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB1000

² UCLA Luskin Center for Innovation. 2021. "[Evaluating Multi-Unit Resident Charging Behavior at Direct Current Fast Charging](#)"



source more than twice as often as home charging and nearly three times more than public Level 2. These findings underscore the critical role DCFC infrastructure plays in ensuring equitable access to EV charging, and we are encouraged to see that CEC staff is rightfully prioritizing deploying DCFC in the CTP investment strategy.

Consider Larger Format Sites for Future Solicitations

To further support EV adoption, CEC staff should consider the value of larger format charging stations—specifically, sites with 10 or more co-located DCFC ports—in future funding solicitations. These "gas station model" sites play a critical role in meeting California's transportation electrification goals by providing more chargers, faster charging speeds, and quicker turnover so that more vehicles can be serviced during peak hours. The most recent AB 2127 report³ highlights this model as a viable future scenario, noting that many drivers prefer fast charging—particularly on long-distance trips or when home charging is unavailable.

Electrify America is already investing in this approach, with large-scale stations deployed in San Diego and San Francisco, and another opening soon in Southern California. In addition to hyper-fast charging, these locations offer convenient access to amenities, enhancing the overall driver experience. Research from UC Davis⁴ reinforces the value of this model, showing significantly higher charger utilization at sites that have faster charging speeds, greater charger density, and co-location with amenities. We encourage CEC staff to evaluate and prioritize the role of large-format DCFC charging sites in future solicitations to better align investments with driver preferences and to ensure the development of an accessible, efficient, and equitable charging network.

Our Continued Support

Electrify America remains committed to partnering with CEC to advance California's transportation and climate priorities, and we look forward to continuing to work with staff around developing the updated CTP investment plan. Thank you again for the opportunity to comment and engage in this process.

Sincerely,

/s/

Rhiannon Davis
Director of Government Affairs
Electrify America, LLC

³ CEC. January 2024. [Assembly Bill 2127 Second Electric Vehicle Charging Infrastructure Assessment](#)

⁴ UC Davis and Next 10. 2024. [Analyzing the Business Case and Consumer Preferences for Fast Chargers in California.](#)