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Comment Received From: Eileen Wenger Tutt

Submitted On: 7/12/2016

Docket Number: 16-ALT-01

CalETC Comments Re: CEC Staff Workshop on Funding Strategies for EV Infrastructure

Additional submitted attachment is included below.



July 12, 2016

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 16-ALT-01
1516 Ninth Street
Sacramento, CA 95814-5512

Re: June 6, 2016 – CEC Staff Workshop on Funding Strategies for Electric Vehicle Infrastructure

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to comment on the California Energy Commission's (CEC's) staff workshop on funding strategies for electric vehicle infrastructure, held on June 6, 2016.

CalETC is a non-profit association promoting economic growth, clean air, fuel diversity and energy independence, and combating climate change through the use of electric transportation. CalETC is committed to the successful introduction and large-scale deployment of all forms of electric transportation including plug-in electric vehicles, transit buses, port electrification, off-road electric vehicles and equipment, and rail. Our board of directors includes: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, and the Southern California Public Power Authority. Our membership also includes major automakers, manufacturers of zero-emission trucks and buses, and other industry leaders supporting transportation electrification.

CalETC supports the Energy Commission's efforts to ensure that California continues to be an attractive market for zero-emission vehicles. The CEC's actions in the Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP) have been essential in supporting our state's network of charging infrastructure—the largest in the country—and in contributing to California's plug-in electric vehicle (PEV) sales, which make up the majority of sales in the U.S. However, it is critical that ARFVTP funding continue to support this burgeoning market and help overcome the tremendous challenges inherent in transitioning to zero-emission technologies. At the end of 2015, plug-in electric vehicles (PEVs) represented only 3.1% of the new vehicle market in California and only 0.66% in the U.S.¹ Private investment will follow the CEC's clear, consistent commitment to grow the PEV market.

We respectfully submit the following comments for your consideration:

CalETC supports the CEC's goals for charging infrastructure deployment. As stated during the workshop, the CEC's investment in charging infrastructure should: spur private investments; encourage reliable, convenient, and competitively-priced charging infrastructure; result in rapid deployment; target strategic locations with the potential for high utilization and locations that will spur EV adoption; and consider

¹ See, e.g., Cobb, Jeff, California Plug-in Sales Led The US Last Year with Nearly Five-Times Greater Market Share, February 17, 2016, <http://www.hybridcars.com/california-plug-in-sales-led-us-last-year-with-nearly-five-times-greater-market-share/>.

future needs, grid impacts and benefits, and emerging technologies. Conveniently-located fast chargers, as well as strategically-located level 1 and 2 chargers will result in benefits for PEV drivers, but we recognize that infrastructure needs and resulting benefits should be determined on a case-by-case basis.

CalETC supports the CEC's strategies for deploying charging infrastructure in order to spur PEV adoption. Vouchers or rebates for charging infrastructure could be very effective for accelerating the build-out of charging stations. Any voucher or rebate program should remain straightforward and simple. We also like the second strategy of providing block grants, given out by a third-party administrator. The California Air Resources Board's Clean Vehicle Rebate Project (CVRP) has been extremely successful and employs a similar process; a third-party administrator awards rebates to qualifying buyers of PEVs. A block grant process and a voucher/rebate process could be set up in a similar way, but the CEC should seek to ensure such grants leverage private investment. In addition, we support the CEC's third strategy, to put out small targeted solicitations with a simplified application process as well.

We recommend that any charging-infrastructure incentive programs be open to low-cost, non-networked (or "dumb") chargers. Allowing for non-networked chargers to qualify for these incentive programs will greatly increase the deployment of chargers and effectively leverage private investment. As was mentioned during the workshop and within other docketed comments, non-networked chargers are highly reliable and cost a fraction of what networked chargers cost. The reliability and reduced cost of non-networked chargers makes them especially attractive for workplaces, multi-unit dwellings, and public park and recreation areas.

CalETC supports the CEC's proposed funding categories for regional readiness and planning. Feasibility studies are a good way to get those counties without regional readiness plans more involved in determining where PEV infrastructure is needed. However, we would encourage the CEC to consider feasibility studies as the first step to developing regional readiness plans for these counties, so that the feasibility studies result in additional concrete planning.

We support the CEC's planning-development category, which would allow for the development of new regional readiness plans to include: the status of current ZEV infrastructure, barriers to ZEV adoption, and strategies to advance ZEV adoption; projections of ZEV deployments; region-specific guidelines for infrastructure; location analysis of infrastructure, projections of investments required, and projections of anticipated ZEVs that will use infrastructure.

We believe the third funding category, planning implementation, will result in additional ZEV infrastructure, better existing-infrastructure reliability, and enhanced understanding of ZEV infrastructure needs throughout the planning region. We support the CEC's plan to limit implementation to activities that relate to PEVs and fuel-cell electric vehicles, and to ensure applications include benefits for disadvantaged communities.

CalETC supports the CEC's goal to encourage smart mobility services involving electric vehicles (or e-mobility). Incentivizing the incorporation of electric vehicles into mobility services—like ride-sharing, car-

sharing, and ride-hailing—is a great way to increase PEV awareness among consumers who are unaware of PEV technology and benefits. We support CEC investments in infrastructure that would complement and contribute to the incorporation of PEVs within mobility services.

We recommend that appropriate programs and solicitations be fortified with education and outreach, to ensure that the CEC's investments result in enhanced consumer awareness of PEVs. As was mentioned by many stakeholders during the workshop, education and outreach are critical to accelerating the market for PEVs. We agree that appropriate programs and solicitations should include elements of outreach and education in order to reach a larger array of drivers. For example, an investment in charging infrastructure for e-mobility programs serves to get more PEVs on the road, and also increases PEV awareness among those using mobility services.

CalETC recommends that the CEC and the administrator for the California Capital Access Program (CalCAP) Loan Loss Reserve hold another workshop to consider what amendments or changes in administration should be incorporated to ensure that this program is successful. We were surprised to hear that no loans have been made to date under this program. We support the idea of having a navigator to aid small businesses and lenders in learning about and applying to use this program. We also believe that allowing for CalCAP loans to match grants from certain entities, like utilities, could result in higher program utilization.

Thank you for your consideration. Please do not hesitate to contact us should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eileen W. Tutt".

Eileen Wenger Tutt, Executive Director
California Electric Transportation Coalition