

DOCKETED

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Comment Received From: Richard Teebay

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e4 Mobility Alliance Comments

Thank you for allowing us to submit comments.

Additional submitted attachment is included below.



July 26, 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
Docket Number 16-ALT-01**

Dear California Energy Commission Staff,

My name is Richard Teebay. I am employed by the County of Los Angeles and, with Patricia Kwon of the South Coast Air Quality Management District, I served as Co-Chair of the Southern California Association of Governments' (SCAGs) Plug-In Electric Vehicle (PEV) Coordinating Council. I have been in Fleet Management for more than 40 years and have been a member of the National Association of Fleet Administrators (NAFA) for more than 30 years. I have served as the Chair of the NAFA Pacific Southwest Chapter and as Chair of NAFA's (National) Fuels and Technology Committee. I am not writing you today not as a representative of my employer, SCAG, or NAFA.

I am a Co-Chair of the Los Angeles Economic Development Corporation's e-4 Mobility Alliance (formerly the e-Mobility Task Force). We are committed to making the region a leader in the electrification of transportation and autonomous vehicles. The region must be a leader, not just a consumer of these technologies. I am writing you as both a private citizen and on behalf of my fellow Co-Chairs at the LAEDC's e4 Alliance. The LAEDC's e4 has been actively engaged in creating and recreating the EV infrastructure within the Los Angeles region for more than half a decade. I have applied for, and the County has received multiple grants to install EV infrastructure at County sites. My Co-Chairs and I all drive PEVs. Thank you for allow me to submit my comments on the funding strategies for electric vehicle infrastructure deployment in California.

We support Cal ETC and ClipperCreek's recommendations that the CEC consider a Rebate Style Program verses the current Grant Program – especially for sites in Disadvantaged Communities as identified by [CalEnviroScreen](#). A Rebate program, similar to the Air Resources Board's Clean Car Rebate Program, would be much easier for public agencies and others to access and create a more level playing field verses the current competitive grant process. It can be very difficult for smaller, rural, and/or less well-funded agency, to write and submit a successful grant application.



Grants favor those applicants with the resources to prepare complete and competitive applications. Not infrequently, the network firms with a vested interest prepare the applications, locking the “successful agency” into selecting their products and services.

We support providing Rebates to those who install EVSE for their fleet, worksites and/or at certain public venues.

- The Rebates could be for Fleet, Workplace and/or Public infrastructure. (Fleet could offer the greatest benefit.)
- A minimum of 25% (or perhaps as much as 40%) of the Rebates shall be designated for Disadvantaged Communities.
- There should be geographic equity between the various regions of the State – with a minimum funding of 10% to each region.
- No one site should receive more than x% of the funding.
- No single recipient should receive more than 12.5% of the funding for its combined sites.
- The Rebates could be used in conjunction with other local or Federal incentive programs.
- The Rebates would provide a maximum of \$5,000 per EVSE Plug (averaged cost per plug) but could not exceed half of the recipient’s final cost.
- The Rebate would provide a maximum of \$7,500 per EVSE Plug (averaged cost per site) and up to 80% of the recipient’s final cost per EVSE Plug if located in a Disadvantaged Community.
- If EVSE are installed at 2% (4% if 100 spaces or less) or more of the site’s parking spaces,
 - Increase the maximum to \$6,000 per plug or \$8,000 per plug for DC.
 - Provide an additional or Bonus of \$5,000 (\$7,500 - DC) per site.
- The Rebates could not be used for “single-purpose EVSE” such as for the sole use of executives at his/her parking spaces.
- If Networked, all EVSE shall be OCPP Compliant.
- If Non-Networked, the site shall install a meter or sub-meter to track usage and for usage reporting.
- Applicants would apply or reserve Rebates for a given site installation. Once the application is approved and funding reserved, the applicant would have six months to complete the installation.

Other issues/thoughts:

- Should these Rebates be limited to existing parking structures and surface lots or will new parking structures be eligible?
- Should large For-Profit public entertainment destinations be eligible for these Rebates?
- Would/should local Municipally Owned Utilities be eligible for these Rebates?



On January 1, 2017, all new EVSE installations must comply with the State Architect's ADA Accessibility Building Standards. The State Parks Department is now budgeting \$30,000 for each new ADA compliant parking space.

Beginning with the 2018 Model Year, auto manufacturers must begin complying with the Air Resources Board's Zero Emission Regulation. By Model Year 2020, 9.5% of all light duty vehicles sold in California must be Plug-ins – this is *four times* the percentage of PEVs sold in California today. By Model Year 2025, more than 20% of all new light duty vehicles must be Plug-ins – an eight fold increase in less than ten years.

In the Los Angeles region, the current ratio of PEVs to public EVSE is more than 18 vehicles per public EVSE. The ARB's ZEV regulation will dramatically increase the number of PEVs sold in California. Far more public infrastructure will be needed.

As the current PEVs come off lease and move into the secondary market, public infrastructure will become even more critical. For example, more than 10 million people live in the County of Los Angeles. There are 3.4 million households. About 45 percent, more than 1.5 million households, live in multifamily dwellings with little or no access to charging. Where will those in multifamily housing recharge these vehicles?

I strongly support trying a Rebate approach similar to that suggested by Cal ETC and Clipper Creek.

Thank you again for allowing me to submit my comments,

Richard F Teebay
Co-Chair LAEDC e4 Mobility Alliance

c: Eileen Wenger Tutt, Cal ETC

Will Barrett, ClipperCreek