

DOCKETED

Docket Number:	17-EVI-01
Project Title:	Block Grant for Electric Vehicle Charger Incentive Projects
TN #:	227363
Document Title:	EVgo Comments Changes to LCFS in CalEVIP Program Guidelines
Description:	N/A
Filer:	System
Organization:	EVgo
Submitter Role:	Public
Submission Date:	3/20/2019 8:44:44 AM
Docketed Date:	3/20/2019

Comment Received From: EVgo
Submitted On: 3/20/2019
Docket Number: 17-EVI-01

Changes to LCFS in CalEVIP Program Guidelines

Additional submitted attachment is included below.



11390 W. Olympic Blvd, Suite 250
Los Angeles, CA 90064

March 20, 2019

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814 -5512

RE: Docket No. 17-EVI-01

Dear Vice Chair Scott,

EVgo commends the California Energy Commission (CEC) for its continued leadership in establishing California as the undisputed leader in transportation electrification. EVgo is proud to serve as a partner to the CEC and other industry partners to deploy our nation-leading public electric vehicle (EV) charging infrastructure enabling more Californians to access the benefits of EVs today. Due in large part to our collaboration with the CEC and other state agencies, more than 90% of Californians now live within 35 miles of an EVgo fast charging station. According to a study by the U.S. Department of Energy¹, EVgo has the largest number of DC fast charging stations of any network in the country. To date, we have over 1100 fast chargers in 66 metropolitan markets, with nearly half of our fast charging network in California.

Programs such as CALeVIP are critical for increasing the number of fast chargers to propel the state toward former Governor Brown's goal of 10,000 fast chargers by 2025, and EVgo has been pleased to participate in the CEC's successful CALeVIP project this year, as well as related CEC workshops and webinars related to the program.

However, EVgo was surprised to see a late addition to the public program manual published without opportunity for stakeholder input as it relates to low carbon fuel standard (LCFS) crediting.

To receive an incentive, an applicant must release claim to LCFS dispensed fuel credits to SMUD through acceptance of application terms and conditions. SMUD will register EV chargers with California Air Resources Board to claim LCFS dispensed fuel credits prior to incentive payment.

While the partnership with SMUD expands the size of the total funding, forfeiting LCFS greatly diminishes the value of the CALeVIP program for each applicant. Without the ability to participate in the LCFS program, sites funded through CALeVIP will be at a permanent competitive disadvantage to charging services provided by other non-CALeVIP-funded sites in Sacramento County.

Given the substantial harm to the value of the CALeVIP program from this late programmatic change, EVgo thereby respectfully recommends that either this requirement be struck, or that the program be put on hold until further stakeholder discussions on this topic may be held.

EVgo appreciates the attention to this issue on the webinar on March 19, and thanks the CEC for the opportunity to provide input. We look forward to additional opportunities for stakeholder input on program design for this and future CALeVIP projects.

Sincerely,

Sara Rafalson, EVgo
Director, Market Development
sara.rafalson@evgo.com

¹ U.S. Dep't of Energy Off. of Energy Efficiency & Renewable Energy, FOTW #1052, October 22, 2018: *Four Networks Maintain Over 60% of Level 2 and DC Fast Charging Stations* (Oct. 22, 2018), <https://www.energy.gov/eere/vehicles/articles/fotw-1052-october-22-2018-four-networks-maintain-over60-22343-level-2-and-dc>