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Comment Received From: Byron Washom
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highly leveraged opportunities for the CALeVIP project represented by the California's Public Higher Education Institutions

Additional submitted attachment is included below.

September 5, 2019

California Energy Commission
Attn: Brian Fauble
Docket Unit, MS-4
1516 Ninth Street
Sacramento, C A 9 5814- 5512

Re: Docket No. 17-EVI-01

Subject: Testimony on the highly leveraged opportunities for the CALeVIP project represented by the California's Public Higher Education Institutions

Dear Energy Commission & Staff:

Thank you for the opportunity to participate in the August 27, 2019 Workshop inviting comments on the forthcoming implementation plan for the CALeVIP in 2020. The pent up demand exhibited in previous regional deployments by CALeVIP, and subsequent over subscription, has clearly prompted the need to optimize the available funding in order to provide the highest of infrastructure accessibility at the most affordable price and to the greatest population possible, particularly that which has historically been underserved. I would like to offer my personal perspectives on improvements for the CALeVIP 2020 project from my experience as Director of Strategic Energy Initiatives at UC San Diego.

I would encourage the CEC to give an emphasis on the workplace/public charging opportunities at Public Higher Education Institutions based upon the volume of this segment and the diversity of the demographics of this segment targeted by the CALeVIP program. As illustrated in the table below, the 10 University of California campuses, 23 CA State Universities and 113 CA Community Colleges represent a total population of 3.4 million individuals. If this population segment were to achieve a level of just 5%

| | UC | CSU | CCC | TOTAL |
|------------------|---------|---------|-----------|-----------|
| Students | 252,000 | 460,200 | 2,400,000 | 3,112,200 |
| Faculty | 21,200 | 24,500 | 60,000 | 105,700 |
| Staff | 144,000 | 23,000 | 30,000 | 197,000 |
| Total | 417,200 | 507,700 | 2,490,000 | 3,414,900 |
| # of CAMPUSES | 10 | 23 | 113 | 146 |

penetration in EV ownership, then it would represent achieving 11% of Governor Brown's Executive Order's goal by 2025.

However, achievement of this potential penetration would be greatly inhibited if there is not a redefinition in the program plan. Previous CALeVIP language in prior regional projects had the definition of project site eligibility as, "be located at a physical site address" within the defined region. The previous interpretation of a "physical site address" was a US Postal Service street address. Virtually all CSU, UC and Community College plus large workplace employers have a SINGLE US Postal Service address and internally distribute their mail. Continued interpretation of "physical site address" would conceivably limit one project per college campus.

There is ample evidence that grant incentive programs and settlement funds that co-fund the electrical infrastructure and the charging equipment has had significant results on California's UC, CSU and CCC campuses. UC San Diego benefited significantly from the CPUC-NRG/EVgo Settlement Agreement that provided 176 40 amp "stub outs" that enabled a present performance of 77 MWH/month of EV charging to 1200 unique EV drivers/month that are student, faculty, staff, ride sharing and public members. The growth rate at UCSD in MWH and new EV drivers has been 8% PER MONTH. Recent nationwide data of all universities and colleges from a prevalent EV equipment supplier indicated that based upon the past 30 days performance that UC San Diego is #1, CSU-East Bay #3, San Mateo Community College District #4, UC Irvine #7, CSU-Fullerton #8, CSU-LA #9, Cabot Los Positas Community College #10, UC San Francisco #11 and UC Riverside #12. The "Build it and they will come" strategy at the CA Public Higher Education campuses is self-evident when there is access to co-funding for critical infrastructure.

I understand the desire to spread the CALeVIP funding to as many project sites as possible, but the reduction of the previous limit of twenty (20) chargers is likely to erode the effectiveness to this targeted segment. Given the long dwell times at a university's campus, the strategy of "power sharing" with two ports on one charger or "adaptive charging" that is highly responsive to Vehicle Grid Integration both enable more practical dwell times of 4 to 8 hours. Therefore, in order to have the maximum environmental, economic and customer service benefits, the CALeVIP program should be more focused on the number of 40 amp circuits and not the number of charging ports in order to keep in sync with a clear technology trend of maximizing the potential value of within-session managed charging that provides the same amount of total charge as determined by each EV driver. Thus, the maximum number of 40 amp circuits, i.e. chargers, at a project site should remain at twenty (20).

I would encourage the CEC to clarify with the CARB staff if CARB's new regulations for DC Fast Charger recapturing of Capital Expenditures and quarterly performance through the Low Carbon Fuel Standard program permits the filing entity to be any party other than the owner of the charging equipment. It is my understanding that the DCFS owner CANNOT designate to another party, such as co-sponsor or lessee that does not have title to the equipment, to file for the LCFS credits or assign the revenue.

Finally, I would encourage the CALeVIP manual for 2020 to make Light-Duty Fleet at Private/Public Shared Use project sites eligible in San Diego County identical to the other four counties in 2020.

Onward,

Byron J. Washom