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## **GRID Alternatives Comments on REMI Pre-Solicitation Workshop**

GRID Alternatives is pleased to provide the attached comments regarding the Commission's Reliable Electric Mobility Infrastructure (REMI) pre-solicitation workshop. Thank you for the opportunity to provide input on this important equity program!

*Additional submitted attachment is included below.*



March 15, 2020

California Energy Commission  
Docket Unit, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

VIA DOCKET  
Energy Commission Docket 20-TRAN-01

Re: 20-TRAN-01 Reliable Electric Mobility infrastructure

Dear Commissioners:

GRID Alternatives (GRID) submits the following comments regarding the Reliable Electric Mobility Infrastructure (REMI) pre-solicitation workshop. GRID appreciates the Commission's efforts to coordinate its efforts on REMI with the California Air Resources Board (CARB) Clean Mobility Options for Disadvantaged Communities (CMO) program, and would like to share some lessons learned from GRID's work as part of the CMO statewide administration team that we believe could be valuable in shaping the REMI solicitation.

### **I. REMI Should Address Barriers to Participation by Leveraging Existing Outreach Programs**

CARB has structured the CMO program to address the fact that the communities and community-based organizations (CBOs) that most need funding for clean mobility options, often face significant barriers to applying for these funds. CARB has contracted with a strong, third-party administration team of four mission-aligned nonprofit organizations, led by CALSTART, to facilitate this effort. GRID serves as a dedicated equity outreach lead for this partnership, and brings to this work a longstanding statewide network of deep relationships with priority communities throughout California.

Even with these additional support resources, we often find that smaller organizations lack the staff capacity to engage in the solicitation response process, particularly when it requires a significant learning curve to even understand whether or not this type of opportunity is worth pursuing. Existing staff capacity can easily be confused or overwhelmed by the combination of a new program where some of the details are still being worked out; the complexities of program rules and regulations; new technologies that are not familiar to many communities; and the lack of a large installed base of reference projects in peer communities.

The good news is that the Commission has a unique opportunity to take advantage of these learnings to create a solicitation that is simple, and leverages the existing outreach and technical assistance work

that CMO is doing in priority communities across California to help lower-capacity applicants access these funds. GRID is extremely heartened to see the pro-active coordination taking place between CEC staff members working on REMI and CARB staff members working on CMO, and we are excited to support that coordination however is most helpful. CEC could also leverage other existing efforts, such as the technical assistance offerings from the [SOMAH \(Solar on Multifamily Affordable Housing\) incentive program](#) from the California Public Utilities Commission (CPUC).<sup>1</sup>

## **II. REMI Should Include Support for Pairing Charging Infrastructure with Solar Power**

During the early development of the CMO program, GRID staff traveled across California and met with local CBOs in urban and rural communities that were interested in implementing clean mobility equity projects. Several of these organizations asked that solar power be included in these funding programs along with funding for charging infrastructure. Investing in solar power is one of the few ways to support long-term mobility project financial sustainability through a one-time capital grant - by paying for the up-front costs of solar, a grant can effectively buy down long-term operating costs through reduced vehicle fueling expenses. Solar pairs these economic benefits with clean energy benefits to ensure the lowest possible emissions profile for new electric mobility services, while serving as a highly visible way that organizations can promote clean energy in their community.

CARB was able to incorporate this feedback into the CMO program design by including partial funding for solar power investments that specifically offset the energy use of new or expanded e-mobility services funded under the program. Given the Commission's core focus on clean energy, REMI could take this to the next level and provide grantees with full cost coverage for pairing solar PV systems with charging infrastructure for e-mobility projects, paired with simple guidelines to ensure that the funded solar PV system sizes are aligned with the projected energy demand of the new mobility programs.

## **III. REMI Should Be Used to Operationalize the CEC CLIMB Action Plan**

The REMI solicitation is a great opportunity to operationalize the recommendations of the [Commission's Clean Energy in Low-Income Multifamily Buildings \(CLIMB\) Action Plan](#)<sup>2</sup>. The Commission can do this by creating a program design and solicitation specifically designed to meet the needs of the multifamily affordable housing community, that leverages complementary programs serving this sector at other state agencies including CARB and the CPUC. GRID has worked extensively with the multifamily affordable housing sector throughout California, and we believe that shared electric mobility is particularly well aligned with the needs of these communities. Given that over 80% of all charging takes place at home, unlocking this market will be critical to helping working families access the economic benefits of clean mobility, including reduced transportation expenditures and increased access to employment opportunities. While many affordable housing nonprofits want to enable their tenants to access the benefits of electric vehicles, they often run into a classic "chicken and egg" problem: property owners are hesitant to invest in charging infrastructure because their tenants

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<sup>1</sup> <https://calsomah.org/>

<sup>2</sup> <https://efiling.energy.ca.gov/getdocument.aspx?tn=224513>

don't drive EVs, and tenants aren't interested in purchasing EVs because they can't charge them at home. When paired with the major financial and time constraints faced by both affordable housing organizations and their tenants, and the widespread belief in many low-income communities that EVs are prohibitively expensive, innovative strategies like shared mobility are needed to serve this market.

The CMO program has taken significant steps to structure its eligibility criteria and program design to align with the characteristics and needs of the affordable housing sector. These steps include providing eligibility to affordable housing complexes that are outside of Cal EnviroScreen 3.0 Disadvantaged Communities, and aligning eligibility criteria and program design components with the CPUC's \$1 billion SOMAH incentive program. The Commission is well positioned to build on this momentum with REMI to create a solicitation that makes it easy for affordable housing owners to access these funds. The benefits of this strategy would include:

- Helping housing owners stack funding between different programs;
- Supporting coordinated and streamlined infrastructure deployment to increase efficiency and reduce construction disruptions to local residents; and
- Leveraging existing outreach and TA investments targeting the affordable housing sector

#### **IV. REMI Should Ensure that Flexibility is Built into Program Administration**

Lastly, one of the things GRID has learned in both CMO, and in our implementation work with a variety of other equity programs across California and beyond, is the critical need for **flexibility**. Many well-intended program rules and regulations can accidentally create barriers to participation for smaller community-based applicants in high-priority communities, particularly since these organizations rarely have the capacity and bandwidth to engage in the pre-solicitation development process of those regulations. To the extent that high-impact project proposals fall into gray areas around technical program requirements, creating the capacity for the program administrator to work with applicants to "get to yes" helps make sure that these funds are fully accessible to communities that need these resources the most. This also gives the Commission additional opportunities to get feedback and engagement from community members throughout the application process.

Thank you for the opportunity to provide input on this exciting and much-needed equity program. We look forward to collaborating with the Commission to ensure that low-income Californians have robust and equitable access to electric vehicle charging infrastructure.

Sincerely,



Zach Franklin  
Chief Strategy Officer  
GRID Alternatives