

DOCKETED

Docket Number:	19-ALT-01
Project Title:	2020-2021 Investment Plan Update for the Clean Transportation Program
TN #:	232446
Document Title:	Sara Rafalson Comments - EVgo Comments on 2020-2023 CTP Investment Plan Update
Description:	N/A
Filer:	System
Organization:	Sara Rafalson
Submitter Role:	Public
Submission Date:	3/17/2020 4:05:42 PM
Docketed Date:	3/18/2020

*Comment Received From: Sara Rafalson
Submitted On: 3/17/2020
Docket Number: 19-ALT-01*

EVgo Comments on 2020-2023 CTP Investment Plan Update

Additional submitted attachment is included below.

March 17, 2020

California Energy Commission
RE: Docket Number 19-ALT-01
1516 Ninth Street
Sacramento, CA 95814-5512

RE: 2020-2023 Investment Plan Update for the Clean Transportation Program

Commissioner Monahan,

EVgo commends the California Energy Commission (Energy Commission) for its leadership in helping the state meet its climate and zero emission vehicle (ZEV) goals and appreciates the Energy Commission's partnership as EVgo continues to develop a robust public fast charging network across California.

Headquartered in California, EVgo owns and operates direct current fast chargers (DCFC) at over 800 locations across the United States. In California, where more than half of the EVs in the U.S. are currently located, EVgo's network of fast chargers grew by 40 percent in 2019¹. EVgo manages more than 300 fast charging locations and 750 fast chargers across the state, connecting more than 80% of Californians to an EVgo fast charger within a 15-minute drive. In 2019, EVgo also became the first North American charging market to be powered by 100% renewable energy.

EVgo wants to reiterate its support for the Investment Plan and its near-term emphasis on light duty infrastructure. However, significant program design improvements will be necessary in order to ensure the success of the light duty programs. EVgo appreciates the opportunity to provide feedback on the 2020-2023 Investment Plan Update for the Clean Transportation Program (CTP) draft staff report; EVgo respectfully submits the below comments for the Energy Commission's consideration.

1. EVgo supports a near-term focus on light duty infrastructure but requests longer term certainty in funding for CALeVIP

EVgo is supportive of the Investment Plan and its near-term focus on light duty vehicle charging infrastructure. As Energy Commission staff notes in its Plan, a projected 3,600 charger gap will still exist for DCFC in 2025, even when all program funding is taken into account. Fast charging infrastructure in particular is critical to reaching the state's increasing population of EV drivers and is especially crucial to enable electrification for drivers without reliable access to charging at home or in the workplace, residents of multi-unit dwellings who rely on public charging for the majority of their charging needs, drivers utilizing key transit corridors, as well as light duty vehicle (LDV) fleets, including car sharing and ride sharing applications. EVgo looks forward to continued expansion of its network to serve all Californians through participation in Energy Commission programs like CALeVIP, which is critical for increasing the number of fast chargers to propel the state toward its goal of 10,000 fast chargers by 2025.

EVgo thanks staff for its work to engage stakeholders as it plans for Clean Transportation Program funding through the end of the year. While EVgo is pleased to see the planned funding for light duty infrastructure through 2023, we are concerned that decreasing amounts of funding in the out years will increasingly make charging infrastructure the limiting factor to increasing electrical vehicle adoption. While rapidly growing, this market, especially for DCFC, is still nascent. California must

¹ <https://www.evgo.com/about/news/evgo-announces-40-percent-growth-in-its-california-fast-charging-network/>

continue to accelerate deployment of charging infrastructure, especially as more affordable EVs able to take advantage of increasing charging speeds arrive in the market over the coming years. To scale charging infrastructure and upgrade it to higher speeds, public funding partnerships will continue to be needed.

Additionally, it is unclear what amount of light duty funding will be specifically targeting DCFC deployments through programs such as CALeVIP. To the extent that the Energy Commission can provide a more clear roadmap of investment allocations for specific programs, charging providers can create multi-year development plans and invest in both technology and personnel, helping provide certainty for a market in need of consistent development, especially in light of longer development timelines for DCFC stations.

2. Energy Commission should commit to reforming CALeVIP in its Investment Plan.

EVgo is appreciative of the near-term focus on light duty charging infrastructure investments as part of the Clean Transportation Plan and believes this approach to program funding is critical for the state to meet infrastructure needed to support 2025 and 2030 electric vehicle adoptions goals. EVgo notes that the fundamentals of CALeVIP today have many positive elements for accelerating charging deployments. However, as it stands today, and as evidenced by the recent San Joaquin solicitation, CALeVIP is in need of significant improvements in order to ensure that the program effectively and expeditiously enables successful deployments of charging infrastructure.

Currently, the first come, first serve nature of the program coupled with a relatively low barrier of entry for applicants has led to all announced funding being reserved within hours of program opening. Then, the queue of applications takes months – or sometimes over a year – for churn as sites have a full 12-to-15 months before they lose their reservations; this is problematic because the low barriers to entry for applications may lead to opportunistic or unfiltered applications unable to actually deliver on the program requirements. Similarly, we heard during the workshops that many cities were applying only to release RFPs later or forfeit their reservation after the applicant forgot that they had applied in the first place. Together, these factors lead to a mad dash to apply and oversubscription for reservations on day one, preventing the most shovel-ready projects from receiving a place in line and inhibiting other near-term projects in development. In several cases, EVgo has waited in excess of a year for the go-ahead from program administrators on projects it submitted and has had to cancel reservations as agreements with site hosts facilitating charger installations expired.

For these reasons, attrition has been incredibly high in the CALeVIP program, with the Center for Sustainable Energy (CSE) having quoted an attrition rate of nearly 40% for DCFC programs so far in the Southern California Incentive Program in particular. This data, coupled with the software malfunction on the day that the San Joaquin solicitation opened, point to significant reforms being needed for CALeVIP to deliver on the intent of the Energy Commission.

Many incentive regimes across different technologies – including solar and storage – have seen similar challenges, and EVgo recommends that staff and CSE look to these best practices and lessons learned from other incentive programs to better manage the queue and ensure that the most optimal and sincere applications are being received by staff. For example, requiring utility assessments early in the application process could be one gating item so that only feasible projects actually reserve limited funding.

As it stands, CALeVIP is the only truly statewide program in California today with the opportunity to help the state achieve market transformation at scale and across all geographies. If these design elements of CALeVIP are improved, it will fix known challenges limiting current deployments, filter out unserious actors, and create a more manageable queue for program administrators. Most importantly, chargers will get in the ground and be ready for California EV drivers to use much faster.

EVgo looks forward to collaborating with staff and other stakeholders on reforms necessary to the success of CALeVIP, especially as it relates to the management of the queue.

3. EVgo respectfully asks for the most up-to-date data on the NRG Settlement to be included in the CTP Investment Plan.

EVgo was pleased to see a call-out to the NRG Settlement on p. 31 of the Investment Plan. Though independent of NRG since 2016, EVgo continues to implement the settlement-build NRG is obligated to fund. As staff finalizes the Investment Plan, as well as proceeds with the AB 2127 process, EVgo provides the following data and recommends its inclusion in both documents.

For tracking as it relates to the charging infrastructure needs assessment, EVgo notes that it has nearly completed the execution of the \$102 million investment on behalf of NRG, which has resulted in the deployment of over 525 energized fast chargers to date and nearly 7,000 Level 2 make-ready stubs. Once all sites are energized, EVgo will have deployed over 560 fast chargers through this settlement, double the original compliance requirement, due to cost efficiencies.

Out of the nearly 525 DCFC energized to date under the historic 2012 settlement, more than 40% of sites are in low-income communities and more than 20% of sites are in disadvantaged communities (DACs). In 2019, EVgo opened seven EVgo Equal Access Charging Hub (or EACH) locations in California communities most impacted by air pollution – including Anaheim, Compton, Inglewood, Richmond, and San Leandro – helping to promote electrification for all.²

Conclusion

EVgo thanks the Energy Commission for its leadership role in accelerating charging infrastructure investments throughout California and its focus on light duty infrastructure in the Investment Plan. EVgo looks forward to working in collaboration with staff on program design improvements to ensure that the funding allocations for the Energy Commission are spent in a way that encourages market transformation by allowing for expeditious, successful charging infrastructure deployments.

Sincerely,



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

² <https://www.evgo.com/communities-charging-for-change/>