

**DOCKETED**

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*Comment Received From: Kitty Adams  
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## **Strategies to Increase Investment in Charging Infrastructure**

*Additional submitted attachment is included below.*



June 2, 2020

California Energy Commission

Docket # 20-FINANCE-01

RE: Strategies to Attract Private Investment in Zero Emission Vehicle Charging Infrastructure and Other Clean Transportation Projects

Adopt a Charger, Inc. (AAC) is a 501(c)3 non-profit organization, based in California that has facilitated EV charging installations in 10 states. Our mission is to raise awareness of plug-in electric vehicles (PEV) by broadening EV charging infrastructure. Our unique approach matches a funding source with a high-profile destination like National Parks, State Parks, museums and universities. We solicit funding to install “free to the user” EV charging to encourage communication between the EV curious and actual owners, who have proven to be enthusiastic sales people for the new technology. AAC acknowledges that people need to be able to see cars plugged in to make the connection that these vehicles run on electricity.

AAC specializes in inexpensive, noncomplex, **reliable** solutions, where drivers simply pull up and plug in. There is no need for membership, RFID card or authorization of payment. Included in the project budget is 3 years’ operation and maintenance. Typically, the only cost to the site host is the relatively insignificant cost of the additional electricity. Because these chargers are offered “free of charge” to the driver, we get high utilization and maximum exposure of PEV. The AAC nonprofit model has proven to be a successful example of public/private partnerships, and all projects we have been involved in resulted in higher than average amounts of match funding.

AAC is grateful to have received funding for projects from the CEC ARFVTP program. Most recently the grant to install up to 61 EVSE at 12 California State Parks. Prior to this grant, AAC worked with South Coast AQMD and LADWP to utilize CEC funding at Leo Carrillo State Beach, Malibu Creek State Park, Baldwin Hills Scenic Overlook, The Natural History Museum of LA County, the Getty Center, Getty Villa, LA Zoo, and 3 popular LADOT parking lots. AAC assisted the Golden Gate National Recreation Area with a CEC grant for Stinson Beach and Fort Mason. In addition, we assisted the Mendocino Land Trust with their CEC grant proposal for EV charging at 10 California State Parks. These projects provided insight that should be considered for upcoming solicitations.

**AAC offers the following recommendations to attract private investment:**

- 1. Stay flexible in your funding approach to allow for a variety of business models and approaches, which will spark innovation. Give site hosts “consumers choice” in their preferred method of delivery, to best suit their needs, and customize the approach for their unique circumstance.**

Currently, the strict eligibility requirements proposed by the Cal eVIP program make it impossible for Adopt a Charger to utilize State funding to expand an alternative business model that has proven successful at raising awareness of PEV, maximizing GHG reduction, and increasing eVMT. Most concerning is that AAC has been effective at installing EV charging in hard to commercialize locations, including disadvantaged communities and rural areas, where other business models do not make sense.

It is very important that the CEC remain focused on policies that incentivize the adoption of plug-in vehicles. Current requirements stifle innovation and restrict consumer choice. There is a lot to learn from countries like Norway and the Netherlands, where EV sales have reached 10% of overall vehicle sales. Wireless charging, Level 1, and deviation from cord connected Level 2, are all approaches that should be explored. The result may prove to decrease liability and theft, at the same time increasing reliability and cost savings. I would also encourage the CEC to consider funding projects that combine Tesla proprietary chargers when with standard J-1772 plugs. Most of the site hosts that I approach request solutions to benefit all of their visitors or employees, a number of whom drive Teslas. Children's Hospital in Los Angeles and The Getty Center are two such examples.

**2. Reexamine priorities and focus on how to best serve the end user. The EV driver is the customer.**

We are not on track to meet Governor Brown's ZEV action plan, which is supported by Governor Newsome, calling for 1.5 million cars on the road in California by 2025. I encourage CEC staff to remain focused on the goal of selling plug-in vehicles. Although California leads the country in sales, we are still in the early stages of PEV penetration. Overly complicated systems increase the potential for problems, which make EVSE less reliable, and give the message that the electrification of transportation is not ready for prime time.

The increased burden of satisfying ADA regulations, networking requirements, need for credit card readers, and standard weights & measurement compliance has dramatically increased the average cost per project. The burden of the escalating cost of infrastructure is passed on to the site host, making them less likely to install EVCS, or to the EV drivers which makes public charging more expensive than buying gasoline.

**3. Ease up restrictions on utility ownership and operation of EV charging infrastructure.**

Over the past 10 years the State of California has invested significant amounts of money in charging infrastructure, and we are still far from having an adequate number of charging stations to meet our goals. It is likely that California will face a reduction in the amount of funding available for alt fuels and infrastructure. CPUC approved pilot programs already authorize using rate payer funding to pay for make ready installations, and bringing power to the curb is the most expensive part of any project. By embracing utility capital for owning and operating EVCS, we can drive down costs and make CEC funding go further.

Thanks for considering my suggestions,

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