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*Comment Received From: Cory Bullis*  
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**EVCA Comments on CEC EV Charging Funding IEPR Workshop**

*Additional submitted attachment is included below.*



## Electric Vehicle Charging Association

INNOVATION FOR CLEAN MOBILITY

July 15, 2020

Ms. Patricia Monahan  
Commissioner, Energy Commission  
1516 Ninth Street, MS-33  
Sacramento, CA 95814

### **Re: EVCA Comments on EV Charging Funding IEPR Workshops**

Dear Commissioner Monahan,

On behalf of the Electric Vehicle Charging Association (EVCA), thank you for this opportunity to comment on the California Energy Commission's (CEC) EV Charging Funding workshops as part of the 2020 Integrated Policy Energy Report (IEPR) Update.

EVCA is a non-profit trade association representing eleven electric vehicle service providers (EVSPs), software and equipment manufacturers, installation and maintenance providers, and an autonomous and electric ridesharing fleet operator. Our members include ABM Industries Inc., Blink Charging, BTCPower, ChargePoint, Clean Fuel Connection, Cruise, EVBox, EV Connect, EVgo, FLO, Noodoe, and Volta. EVCA's mission is to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the adoption of EVs and deployment of charging infrastructure.

EVCA thanks the CEC for its partnership as EVCA member companies work to accelerate charging investments to help meet state goals, including 250,000 chargers by 2025 and 5 million zero emission vehicles (ZEVs) by 2030. To this end, EVCA offers the following comments in response to the IEPR workshops for the CEC's consideration. Notably, while EVCA appreciates the CEC's work in assessing future charging infrastructure programs, EVCA believes that CEC's near-term priorities should include extending light duty funding through the duration of the Clean Transportation Program (CTP) and making necessary reforms to CALeVIP to ensure the program's success. EVCA has elaborated on these points below.

- 1. Maintain funding for light-duty EV charging through 2023 to provide certainty to the marketplace.*

Light-duty programs such as CALeVIP are critical to attracting private investment in EV charging. Both charging station development and zero emission vehicle (ZEV) sales are still far short of where we need to be to reach 2025 goals for light duty infrastructure deployment and 2030 goals for vehicle sales, respectively. As exemplified by the Commission's projected shortfall of 80,000 chargers by 2025, the market is still nascent. Not allocating any incentives for light-duty EV charging for 2023 through the CTP as the industry begins to ramp up to higher power, new vehicle models will emerge, and the Clean Miles Standard implementation will begin in earnest sends a market signal at the wrong time – that the CEC intends to stop funding EV charging station deployment well before the markets for vehicles or infrastructure has reached maturation. This not only provides much uncertainty in the marketplace as charging providers look to forecast their investments, but also ensures that lack of infrastructure will remain a barrier as the state looks to encourage EV adoption to meet 2030 goals for 5 million ZEVs.

Therefore, EVCA respectfully requests the Commission include an allocation for light-duty EV charging infrastructure in 2023 to maintain a strong market signal and to further help support both EV adoption for personal use drivers that will help California meet its 2030 state goals.

- 2. CEC should commit to reforming CALeVIP to ensure the program is meeting its goals to deploy charging infrastructure expeditiously.*

EVCA strongly supports CALeVIP, which is the CEC's flagship program for infrastructure deployments. By transitioning away from competitive grant programs to a first-come, first serve rebate, CALeVIP was meant to simplify and expedite charging deployments to meet our state goals. However, as evidenced by the recent solicitation in Sonoma County, various program design challenges exist that are impeding the success of the program. EVCA suggests the following five program design and administrative improvements to CALeVIP administration to leverage this funding as fast as possible to support economic recovery:

First, CALeVIP has low barriers to entry that lead to a rush of applications, creating issues in managing the queue of projects. Applicants reserve funding only through an application, which in turn locks up critical incentive funding for months or even years. This need for a program design change was evidenced most recently by the Sonoma solicitation, which "sold out" in less than an hour. Because the barriers to entry are so low, many of these projects end up falling through because they were speculative in the first place, hurting other viable and "shovel ready" projects. For example, looking at CALeVIP Southern California - Los Angeles, which launched in 2018, only approximately 40% of funds have been issued despite requirements for sites to be energized within a year.

Like previous programs, Sonoma County sold out in less than an hour. EVCA members will be watching programs 60 days from their funds reserved dates to see if the queue issues are resolved given new requirements in the program. If queue issues are ongoing, EVCA respectfully recommends the CEC consider additional upfront requirements to help minimize the queue management issues that the program continues to see.

Second, breaking CALeVIP incentives into subregions can have the unintended consequences of creating an oversupply or undersupply of incentives for infrastructure in various parts of the state while clogging utility queues all at once due to an uptick in requests in a given region. Also, given that the CEC is still in the process of making available incentives for certain regions because of this region-by-region program approach, it has prevented certain regions from accessing the economic benefits of these incentives.

Third, additional program design tweaks will be necessary. For example, 24/7 requirements exclude many eligible sites in urban areas. EVCA recommends looking at best practices from BAAQMD for how to better tackle public access while ensuring that important sites in the urban core, where EV drivers are more likely to rely on public charging due to limited onsite parking. Additionally, the CEC should examine any unintended consequences of applicant caps and ensure that they are issued in proportion to funds allocated to a given county. Last, requiring CHAdEMO and CCS per site instead of per charger would be more in line with how technology is evolving.

Fourth, CALeVIP should be more inclusive of infrastructure deployment strategies and business models, including infrastructure that serves electric autonomous vehicle (AV) fleets. Under the current rules for CALeVIP, many shared electric AV fleets are ineligible. While these fleets will exclusively serve the public, the private nature of the chargers make these models ineligible. Given the potential benefit that shared, electric AV fleets present for California's clean transportation goals, EVCA recommends the CEC adjust parameters of existing programs to reflect that these technologies - while not offering the public access to fleet chargers themselves - provide the public with clean transportation and direct access to green miles. Such amendments will enable the CEC to capitalize on some of the tangible benefits of this technology - including rapid deployment, high charger utilization, and even grid benefits.

Fifth, the market is also being slowed by CALeVIP program processing. Some of our companies are still awaiting CALeVIP program applications submitted in 2019 to be reviewed. In addition to program design improvements, which EVCA details above, this stalling could be alleviated by adding more CEC staff capacity to assist with the backlog of applications and then processing rebates, reporting to the Commission's Agreement Manager. Getting CALeVIP funding "out the door" as soon as possible is imperative to rejuvenating this segment of the economy and helping create jobs.

### **Longer-term Infrastructure Funding Programs**

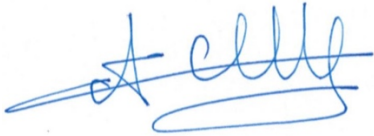
EVCA appreciates the CEC's exploration of additional funding programs such as TERPA which will either complement or follow CALeVIP. EVCA members are still digesting the proposal and look forward to continued engagement as conversations on TERPA - or other infrastructure programs - evolve. As the CEC examines future infrastructure programs, EVCA offers itself as a resource. EVCA encourages the CEC to develop solutions that:

- Encourage competition and innovation in the marketplace by making charging accessible and affordable;

- Promote customer choice and help improve their overall charging experience, and;
- Give the market more certainty in accessing predictable, robust funding that can get “out the door” quickly and leverage significant private investment.

As the CEC continues to consider longer-term infrastructure programs, EVCA would be happy to discuss further to make sure they truly bolster the EV charging market and help deliver the charging infrastructure necessary to enable an electrified future in California.

Thank you for your consideration,

A handwritten signature in blue ink, appearing to read 'A. Cherkaoui', with a large, sweeping underline.

Abdellah Cherkaoui  
Chair  
Electric Vehicle Charging Association