DOCKETED	
Docket Number:	17-EVI-01
Project Title:	Block Grant for Electric Vehicle Charger Incentive Projects
TN #:	234052
Document Title:	City of Daly City Comments - City of Daly City Letter of Support CALeVIP
Description:	N/A
Filer:	System
Organization:	City of Daly City
Submitter Role:	Public Agency
Submission Date:	7/29/2020 9:36:42 AM
Docketed Date:	7/29/2020

Comment Received From: City of Daly City

Submitted On: 7/29/2020 Docket Number: 17-EVI-01

City of Daly City Letter of Support CALeVIP

Additional submitted attachment is included below.



OFFICE OF THE CITY MANAGER CITY OF DALY CITY

333 – 90TH STREET DALY CITY, CA 94015-1895 (650) 991-8125

July 28, 2020

Commissioner Patricia Monahan California Energy Commission 1516 Ninth Street Sacramento, CA 95814-5512

RE: Docket No. 17-EVI-01

Commissioner Monahan,

I write to express the City of Daly City's ('the City') strong support for the Energy Commission's selection of San Mateo County for the upcoming solicitation of the CALeVIP Incentive Program. CALeVIP has been critical to advancing state infrastructure goals to support transportation electrification. We commend the Energy Commission's leadership in EV infrastructure investment.

The City of Daly City recognizes the importance of EV adoption in government fleet and plans to do its part to reduce greenhouse gas emissions by replacing 100 percent fossil-fueled government fleets vehicles with EVs. As the City updates its Climate Action Plan and reviews fleet procurement strategies, EV adoption will feature prominently. Through a recent EVgo grant award, the City is in the process of installing the first EV charging stations on City property. The three EV charging stations will include at least seven DC Fast Chargers, at no cost to operate. The City continues to explore options for acquiring EVs despite budgetary constraints and is looking forward to participating in the upcoming CALeVIP program to deploy additional chargers to enable transportation electrification for our residents, visitors and commuters passing through.

In past deployments and especially in light of current budget constraints that are impacted by COVID-19, the City prefers to deploy EV charging stations through partnerships with third parties where the third party purchases and maintains the DC fast chargers. In these situations, it is common practice for the third party charging network, not the city, to be the applicant of record.

It has come to our attention that this preferred model of participation may be challenged by the proposed applicant cap of \$720,000, which will only be enough to fund two to three sites per provider. Despite a total DCFC allocation of \$12M for San Mateo County, this low cap makes it likely that the program will run out of funding before the City is able to get a reserved allocation through its preferred third party partner. This is an inherent challenge with the applicant caps, especially in the DCFC space, where the owner-operator model is most prevalent.

Moreover, the applicant cap for San Mateo County with a funding allocation of \$12M is the same as for territories in the same program where the funding allocation is limited to \$6M. We respectfully request

that the Energy Commission consider scaling the cap with the size of the allocation per territory so that it is brought in line percentage wise with the caps applicable in other counties like Santa Clara County.

Considering the above, the City finds that the consequence of the applicant cap is that it limits the opportunities for cities to work with third party providers in the DC fast charging space and may therefore unintentionally exclude organizations that do not have the operational, budgetary or legal ability to participate directly. We therefore urge the Energy Commission to increase the cap in advance of the upcoming solicitation and appreciate the opportunity to provide feedback.

Sincerely,

Stephen Stolte

Assistant City Manager