

DOCKETED

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Auto Innovators Comments on CALeVIP Proposed Modifications

Please find the attached comments from the Alliance for Automotive Innovation on CEC's proposed modifications to CALeVIP.

Additional submitted attachment is included below.



October 1, 2020

California Energy Commissioners
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Docket No. 17-EVI-01, Comments of the Alliance for Automotive Innovation on the CALeVIP workshops on September 17, 2020

Dear Commissioners Hochschild, Scott, Douglas, McAllister, and Monahan:

The Alliance for Automotive Innovation (“Auto Innovators”)¹ thanks the California Energy Commission (CEC) for the opportunity to provide comments on the proposed changes to the California Electric Vehicle Infrastructure Project (CALeVIP) presented at the CEC workshops on September 17, 2020.

This is a pivotal point in the development of the electric vehicle (EV) market. Today, there are 66 EV models offered²—more than any point in history—including plug-in hybrid, battery, and fuel cell electric technologies. Moreover, every major automaker has announced plans to increase the number of electrified platforms. In the next five years, automakers intend to offer over 100 different EV models in a variety of market segments.³ However, automotive industry investments alone are not enough to ensure increased market penetration for electrified vehicles. Increasing customer demand for EVs is necessary, and time and time again studies have shown that purchase incentives and available charging/refueling infrastructure are key parameters to increasing customer demand.

¹ Formed in 2020, the Alliance for Automotive Innovation is the singular, authoritative, and respected voice of the automotive industry. Focused on creating a safe and transformative path for sustainable industry growth, the Alliance for Automotive Innovation represents the manufacturers producing nearly 99 percent of cars and light trucks sold in the U.S. The newly established organization, a combination of the Association of Global Automakers and the Alliance of Automobile Manufacturers, is directly involved in regulatory and policy matters impacting the light-duty vehicle market across the country.

² *Veloz Sales Dashboard*, Veloz, <https://www.veloz.org/sales-dashboard/> (data retrieved 9/30/20)

³ <https://www.autonews.com/article/20181001/OEM04/181009990/nearly-100-electrified-models-slated-to-arrive-through-2022>

California currently has 27,347 Level 2 and DC Fast Charging outlets,⁴ well behind its goal of 250,000 charging ports by 2025⁵ to support 1.5 million ZEVs.⁶ Further, California set a target of 100 hydrogen fueling stations by 2020, but today, only 42 of the 100 have been built. Moreover, Governor Newsom's recent executive order, N-79-20, requiring 100 percent of light-duty vehicle sales be zero emission by 2035,⁷ suggests that 250,000 is not nearly enough. In fact, one scenario considered by the Air Resources Board (ARB) at their recent Advanced Clean Cars workshop on September 16, 2020, suggested up to 8 million EVs might be needed by 2030.⁸ Simply scaling the 250,000 charge ports to support 1.5 million ZEVs would suggest that California needs well over 1 million charge ports by 2030. It is critical that incentive programs such as the CALeVIP are sufficiently funded and incentives readily available. Auto Innovators offers the following comments to the CALeVIP proposed changes:

Overall need:

Governor Newsom's executive order will require a drastic scaleup of programs such as CALeVIP to meet infrastructure needs. CALeVIP needs to be fully funded at a level commensurate with the need, potentially expanded to cover additional use cases, and continually updated to ensure smooth operation and to account for technological innovation and lessons learned.

Rebate levels:

We support the \$1,000 increase in funding for the multi-unit dwelling (MUD) adder that CEC is proposing. For residents who do not live in a single-family home, access to charging becomes even more important; therefore, it is imperative that chargers be available at MUDs. In addition, MUDs remain one of the critical barriers to ZEV adoption, and further attention and funding is warranted to help spur innovative solutions to address this barrier.

⁴ <https://afdc.energy.gov/stations/#/analyze?region=US-CA&country=US&fuel=ELEC> accessed September 30, 2020

⁵ Executive Order B-48-14, <https://www.ca.gov/archive/gov39/2018/01/26/governor-brown-takes-action-to-increase-zero-emission-vehicles-fund-new-climate-investments/index.html>

⁶ Executive Order B-16-12, <https://www.ca.gov/archive/gov39/2012/03/23/news17472/index.html>

⁷ Executive Order N-79-20, <https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-text.pdf>

⁸ ARB ACC II Workshop, 9/16/2020, Slide #7, <https://ww2.arb.ca.gov/sites/default/files/2020-09/ACC%20II%20Sept%202020%20Workshop%20Presentation%20%28Updated%29.pdf>

Charging standards:

We appreciate the CEC allowing the marketplace to choose charging infrastructure, and the proposed modifications for CHAdeMO connectors should help with site utilization and provide flexibility for the site. Tesla chargers remain usable by only one manufacturer, therefore limiting available chargers for customers who chose a different EV. The proposed modification for Tesla connectors therefore raises questions regarding program budget, interoperability and open standards, and the use of state funding for charging infrastructure that is restricted to a single manufacturer. This is even more critical given that ARB is considering standardized DCFC requirements for 2026 and later model year EVs as part of ACC II,⁹ and thus the state's resources could be stranded in proprietary chargers that do not work on future vehicles. If CEC does decide to adopt this change, we support the specific additional requirements about co-location of CCS and CHAdeMO chargers at these sites and we recommend revisiting this issue in the future as the market evolves. We also suggest that the CEC re-consider this in the future to find a more cost-effective solution that maximizes charger availability for all citizens.

General Program Function:

The program is continuously oversubscribed with slow project timelines, which delays the timing of expanding necessary infrastructure. We therefore recommend that CEC examine options to make the process operate smoother so as to increase the number of available chargers in the near-term. Some potential opportunities for the program to run smoother would be to require applicants to do some due diligence in advance with utilities and sites in order to reduce attrition, and look at the applicant cap requirements to see if there is an opportunity to improve the ability of owner-operators to leverage CALeVIP. CEC could also consider building on the success of the GFO-19-602 (Hydrogen Fueling Infrastructure),¹⁰ and apply the multi-year, tranche and batches

⁹ ARB ACC II Workshop, 9/16/2020, Slide #45, <https://ww2.arb.ca.gov/sites/default/files/2020-09/ACC%20II%20Sept%202020%20Workshop%20Presentation%20%28Updated%29.pdf>

¹⁰ <https://www.energy.ca.gov/solicitations/2019-12/gfo-19-602-hydrogen-refueling-infrastructure>

approach¹¹ in the GFO to the CALeVIP program in order to accelerate the project timelines.

Auto Innovators appreciates the opportunity to provide these comments on the CALeVIP workshop from September 17, 2020. The CALeVIP is a critical program to increase the available EV charging infrastructure in California – one of many important elements of expanding electric vehicles throughout the state. With the recent executive order, it is imperative that programs such as CALeVIP run smoothly with sufficient funding available. Auto Innovators looks forward to working with the CEC and other stakeholders on improving the CALeVIP program.

Respectfully submitted,



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¹¹ https://www.energy.ca.gov/sites/default/files/2020-05/01_GFO-19-602_Application_Manual_Addendum_04_ADA.docx