

**DOCKETED**

<b>Docket Number:</b>	17-EVI-01
<b>Project Title:</b>	Block Grant for Electric Vehicle Charger Incentive Projects
<b>TN #:</b>	234990
<b>Document Title:</b>	East Bay Community Energy's Proposed CALeVIP Design Change Comments
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	East Bay Community Energy
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	10/1/2020 2:33:53 PM
<b>Docketed Date:</b>	10/1/2020

*Comment Received From: Zac Thompson  
Submitted On: 10/1/2020  
Docket Number: 17-EVI-01*

## **East Bay Community Energy's Proposed CAlLeVIP Design Change Comments**

*Additional submitted attachment is included below.*



## **Comments to CEC Docket 17-EVI-01**

### **East Bay Community Energy Comments on Proposed Design Changes to CALeVIP**

East Bay Community Energy (EBCE) respectfully submits the following comments on the California Energy Commission's (CEC) proposed design changes to the California Electric Vehicle Incentive Project (CALeVIP).

#### **CALeVIP Equipment Requirements: Tesla**

The CEC proposes to allow Tesla connectors so long as CHAdeMO and CCS are also located on-site. EBCE is supportive of this proposal as Tesla eligible connectors would enable CALeVIP funding to meet the needs of the EV market in our service area more comprehensively. However, to accommodate three connector types and scale with California's ambitious transportation electrification goals, EBCE recommends that the CEC consider increasing the maximum number of funded chargers per site to 12. In doing so, Tesla connectors will not come at the expense of the funded other chargers located on site, which are capped at six today. This is especially applicable in high density areas like Alameda County, where nearly half of residents are renters and therefore do not have access to charging options where they live. To transition this population of drivers to zero emission vehicles near term we must deploy more convenient, ample fast charging hubs near hotspots of multi-family dwellings.

#### **CALeVIP Equipment Requirements: Connectors**

EBCE supports the proposed change from the current requirement that every DCFC must have both 1 CCS and 1 CHAdeMO connector, to requiring each installation site to have a minimum of 1 CHAdeMO connector and to have at least 50% of rebated connectors be CCS connectors.

This proposal serves as a way to simplify and standardize EV fast charging around CCS. Most EVs on the road today utilize CCS rather than CHAdeMO to charge. Some OEMs have even recently shifted from utilizing CHAdeMO to CCS (e.g., 2020 Kia Soul), or announced CCS support for their new models (e.g., Nissan Ariya).

The California Air Resources Board has proposed making CCS the standard port for EVs statewide and has projected that by 2022 there will be 51 EV models utilizing CCS while only 2 EV models will utilize CHAdeMO. It is critical that upcoming CALeVIP programs allow for the future proofing of EV charging sites to account for these projections. Providing CALeVIP program applicants (e.g., projects preparing to launch and yet to launched) the ability to install more CCS connectors and fewer CHAdeMO connectors will allow for greater station utilization by the vast majority of EV drivers now and in the near future, while maintaining support for EV drivers that still need to utilize CHAdeMO connectors to charge.



Finally, the industry is trending toward power sharing technology and the CEC's proposal would allow for more charging options such as concurrent dual-port DCFC. Since different EV models are capable of charging at different speeds, dual-port DCFC can throttle accordingly, helping to mitigate grid impacts and demand charges for DCFC operators. EBCE is supportive of the CEC's proposal.

### **CALeVIP: Better Serving Priority Populations**

EBCE supports increasing the minimum DAC/LIC investments to 35% from the current 25%.

EBCE also supports enabling affordable multi-family properties outside of DAC/LIC geographic boundaries to benefit from the current DAC/LIC MUD adder. This is because these affordable housing providers specifically serve low-income residents at these properties similar to those that reside inside the DAC/LIC boundaries. They also often manage a portfolio of properties, and this proposal will allow for more equitable distribution of charging infrastructure and efficient project coordination. EBCE has presented Alameda County specific data that reflects the need to extend this incentive to affordable multi-family property owners and managers with properties outside of DAC/LIC geographic boundaries, and strongly encourages its approval.

Regarding the inclusion of an adder for employment centers that employ LIC residents, EBCE has concerns about the CEC's proposal. As the sole co-funding partner for the 2021 Alameda County CALeVIP project, we have been in close coordination with the Center for Sustainable Energy (CSE) and CEC for the last year on the design of this project. It is clear that the CSE team is managing a great deal of eligibility verification as-is, and we believe this adder may increase application processing complexity and delay project deployment. Additionally, employers of LIC members may be hesitant and/or even restricted in releasing verification information to applicants or CSE, potentially complicating qualification efforts.

Should the CEC continue to pursue this adder, EBCE requests to see detailed data that supports its need in our service area, including for example, which employment centers would be targeted, what the feasibility is of deploying charging infrastructure at these workplaces (parking configurations, number of spaces, etc.), how many employees could be served, etc. If a co-funding partner of a CALeVIP project is required to present data to the CEC to gain support/approval of an adder in their County/region, the CEC should do the same if there is an expectation that the co-funder's investment dollars will be allocated to this adder.