Comment Received From: Leslie Aguayo
Submitted On: 10/6/2020
Docket Number: 17-EVI-01

The Greenlining Institute Comments on Proposed Changes to CALeVIP

Additional submitted attachment is included below.

October 6, 2020

To the Commissioners, Chair and Staff at the California Energy Commission:
From: The Greenlining Institute

Re: CALeVIP Docket Number 17-EVI-01

The Greenlining Institute would like to provide public comment on the CALeVIP project design workshop where proposed changes were introduced. In particular, we would like to address the addition of Tesla connectors as eligible for both Level 2 and DC fast chargers as well as proposed changes to DAC investments.

Tesla Connectors

Greenlining expresses its concern with CEC's proposal to add Tesla connectors to CALeVIP funded chargers. Greenlining believes that opening up the program to Tesla will create an inequitable distribution of funds and charging infrastructure that will not be accessible by all. Tesla's charging infrastructure is exclusively for Tesla drivers and unless they plan to expand access to their charging infrastructure to others, their participation will only benefit a select few.

Greenlining has advocated for CALeVIP to better incorporate equity within their project design. Currently, CALeVIP only offers increased incentives for projects that are within DACs. The program has yet to incorporate a meaningful equity project design in any of the existing projects. The fact that Tesla will be eligible to access and participate in all existing projects before incorporating a statewide equitable project design will only reinforce the fact that equity is not prioritized in these state funded projects.

In 2017, Assembly Bill (AB) 134 (Committee on Budget, Chapter 254, Statutes of 2017), directed CARB and the Labor and Workforce Development Agency (LWDA) to develop procedures to certify vehicle manufacturers as fair and responsible in their treatment of workers[1], which would have limited Tesla's participation in CARB's state-funded programs, like the Clean Vehicle Rebate Project. Even though this standard has yet to be implemented within CARB, we recommend the Energy Commission review this standard as it looks to expand eligibility to Tesla. Equity cannot be a piecemeal approach that is only applied when convenient or to check a box, it must be done with intentionality, even if it means limiting participation of companies that do not prioritize their employees.

DAC Investments

The current proposed changes to CALeVIP DAC minimum investment requirement suggest an increase from 25% to 35%. However, given that there has been a consistent 35% investment CALeVIP has been able to reach we suggest an increase to 50% minimum DAC investment be

[1] https://ww2.arb.ca.gov/sites/default/files/classic/msprog/aqip/cvrp/2018cvrpconceptpaper-labor.pdf

set. As equity targets are designed it is important to strive for greater more extensive minimum DAC requirements to not only capture as many DAC residents but to also reinforce California Energy Commission's commitment to equity and priority of frontline communities.

Additionally, we suggest CALeVIP consider various methodology should the program aim to account for employment data, including but not limited to location quotient and shift share analysis. Regarding allocations based on rural geography, we recommend CEC consider parameters at the city level rather than county level given that even within counties land use and geography can vary widely as is the case in Los Angeles county. Furthermore, should CEC attempt to capture rural communities for DAC investment it is also pertinent to consider unincorporated communities that are commonly rural, often poorly invested in and lack the political power to incentivize comparable metropolitan levels of engagement from state agencies.

We thank the California Energy Commission for their attention to the matter and consideration of our recommendations.

Respectfully,

Leslie Aguayo
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The Greenlining Institute

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