

DOCKETED

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AEE Comments on Pre-Solicitation Workshop Presentation

Additional submitted attachment is included below.

January 8, 2021

California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Re: Docket 20-EVI-01 – Staff Workshop on Second Block Grant for Light-Duty Electric Vehicle Charger Incentive Projects

Dear Commissioners and Staff:

Advanced Energy Economy (AEE) respectfully submits these comments in response to the California Energy Commission’s (CEC) December 17th workshop inviting stakeholder comment on its second block grant for light-duty electric vehicle (EV) charger incentive projects. AEE strongly supports the CEC’s transportation electrification (TE) objectives and notes that Governor Newsom’s recent Executive Order N-79-20 will require an “all hands on deck” approach to accelerate EV infrastructure deployment. We thank the CEC for the opportunity to comment and look forward to the agency’s continued leadership in supporting TE.

I. INTRODUCTION

AEE is a national association of businesses dedicated to transforming public policy to enable a clean, secure, affordable energy future. We are comprised of over 80 companies both large and small across the technology spectrum, including electric vehicles (EVs), energy efficiency, solar, wind, storage, fuel cells, biofuels, demand response (DR), advanced metering, and enabling software. As an organization with stakeholders that provide a range of technologies and services, we balance a wide variety of interests and address issues with a technology-neutral perspective. As it relates to TE, AEE’s membership includes manufacturers of electric vehicles, fleet owners, charging infrastructure providers, grid integration solution firms, and companies providing supporting technologies and software services.

II. COMMENTS

During its December 17 workshop, the CEC identified the main purpose of the solicitation for a block grant implementer: the “quick, efficient, and effective deployment of light-duty electric vehicle infrastructure incentives.”¹ AEE completely supports the CEC’s objective and the underlying need to support TE in a manner that achieves state climate and EV targets. We offer the following comments in support of the CEC’s core goal and look forward to future opportunities to provide feedback on incentive project implementation.

The quick, efficient, and effective deployment of incentives relies on the CEC and implementer’s ability to review and approve project applications in a timely manner. To this end, the CEC has identified several methods for distributing incentive funds for further consideration, including first-come first-served, reverse auction, and a lottery approach.² As a threshold matter, AEE does not strictly oppose the first-come first-served approach used to disburse incentives in CALeVIP. However, to the extent the CEC chooses to pursue this approach in its second block grant, it should seek to address the structural issues that have hampered the project’s ability to quickly and efficiently disburse incentives.

As noted in AEE’s comments on *CALeVIP Project Designs* in Docket No. 17-EVI-01, CALeVIP faces the interrelated challenges of oversubscribed projects, high attrition rates, and long application review periods – each of which run counter to the CEC’s core goal of swift incentive deployment.³ By adopting more stringent gatekeeping measures earlier in the application process, CEC can help reduce oversubscription rates (and consequently lower attrition rates), reduce the amount of time between application submission and notice of approval, and ultimately increase the amount of quality charging projects completed. For example, by requiring applicants to attach a letter of confidence from the relevant utility on the feasibility of the project and adjusting fast charger incentives to reflect the costs of different charger capacities (i.e. lowering

¹ CEC Presentation at Slide 14.

² *Id.* at 28.

³ <https://efiling.energy.ca.gov/GetDocument.aspx?tn=234986&DocumentContentId=67858>

incentives for 50 kilowatt chargers and increasing incentives for 200+ kilowatt chargers), the first-come first-serve approach would more effectively stimulate the efficient deployment of light-duty EV charging infrastructure.

AEE is also open to a competitive grant approach to incentive disbursement, particularly in cases where charging stations are targeted to meet needs of underserved market segments. However, we recommend that the CEC avoid using a lottery to determine awards for project incentive funding. Such an approach would do little to motivate the submission of high quality applications or reduce program attrition rates currently experienced in CALeVIP.

Finally, to ensure EV charging assets remain used and useful, encourage customer choice, support a more consistent charging experience for EV drivers, and complement existing EV load management efforts, AEE recommends that the CEC take an active role in supporting open standards and interoperability for EV charging equipment. CEC has held several workshops in recent years that contemplate the adoption of such standards and the agency has extensive knowledge of EV charging technology trends; the CEC should leverage this experience to develop commonsense program requirements that help certify the EV charging infrastructure being put in the ground today will enable EV charging to be more convenient, secure, and affordable for all drivers. As a starting point, the CEC should use this second block grant funding opportunity to require third-party OCPP certification for all qualified CEC-funded EV charging equipment. The CEC should also consider adopting project provisions that adopt widely accepted standards for VGI communication where appropriate – particularly in light of the rapid growth in EV adoption identified in CEC’s recent AB 2127 EV Charging Infrastructure Assessment.⁴

⁴ <https://efiling.energy.ca.gov/getdocument.aspx?tn=236237>

III. CONCLUSION

AEE appreciates the opportunity to provide comments and looks forward to the CEC's development of new EV charger incentive programs necessary to further accelerate TE in California.

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