

DOCKETED	
Docket Number:	20-IEPR-01
Project Title:	General/Scope
TN #:	236502
Document Title:	EVCA Comments on Energy Commission Draft Integrated Energy Policy Report (Docket 20-IEPR-01)
Description:	N/A
Filer:	Cody Goldthrite
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	1/28/2021 8:15:11 AM
Docketed Date:	1/28/2021



Electric Vehicle Charging Association

INNOVATION FOR CLEAN MOBILITY

January 27, 2021

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

Re: EVCA Comments on Energy Commission Draft Integrated Energy Policy Report (Docket: 20-IEPR-01)

Dear Commissioner Monahan,

Thank you for the opportunity to provide comments on the Energy Commission's (CEC) draft Integrated Energy Policy Report (IEPR).

The Electric Vehicle Charging Association (EVCA) is a not-for-profit trade organization of thirteen leading electric vehicle (EV) charging industry member-companies. EVCA's mission is to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the expeditious and efficient adoption of EVs and deployment of EV charging infrastructure.

We offer the following comments for the CEC's consideration:

- 1. We support the CEC's focus on reducing "soft costs" for electric vehicle service providers.**

EVCA appreciates the CEC's attention to the issues of soft costs – many of those referenced by the IEPR remain challenges that slow charging deployment. However, several recent regulations directed at EV charging station providers have further exacerbated this issue in the last year as well. While we recognize these regulations' various goals, they create additional layers of costs that, when coupled with those identified in the IEPR, make it increasingly more difficult to deploy charging stations in California. We'd encourage the CEC to include this consideration in its definition of soft costs.

Concretely, the CEC is currently designing a regulation under Title 20 for data collection from electric vehicle service providers (EVSPs), which will ultimately increase their soft costs. We respectfully encourage the CEC, given its interest in reducing soft costs, to continue

collaborating with EVSPs on how to best incorporate this goal into the final version of the regulation so as to reduce further unnecessary burden on EVSPs.

Given California's ambitious goals to deploy 250,000 charging stations by 2025 and phase out the sale of gas cars by 2035, we'd like to underscore how increasing soft costs EVSPs' ability to help make these goals a reality.

2. We encourage the CEC to facilitate more discussions between electric vehicle service providers and equity groups to better understand how to incorporate equity in charging station deployment.

EVCA supports the CEC's continued focus on equity and recognizes that low-income and disadvantaged communities have varying challenges and needs when it comes to deploying charging stations. EVCA respectfully encourages the CEC to facilitate more information sharing sessions between equity groups, community-based organizations, utilities, and electric vehicle service providers to better understand the respective needs of communities and develop shared solutions that can both support more equitable distribution of charging infrastructure and larger economies of scale that bring overall costs down. Additionally, as it relates to equity, the CEC should look at the SB 1000 report as an important data driven report related to gaps in charging infrastructure, especially in more dense urban markets.

3. We support the CEC's focus on piloting new innovative regulatory and funding mechanisms to encourage private sector investment in charging.

EVCA agrees that public funding alone will not be enough to achieve the scale of infrastructure needed to meet the state's ZEV and ZEV infrastructure deployment goals. We conceptually support the CEC investigating and piloting new regulatory and funding mechanisms that further promote technological and business model innovation in the market as this can further promote competition and increase cost competitiveness. It is important to note that these programs should complement and not come at the cost of near-term program design improvements to current efforts, such as CALeVIP, to provide greater access to sustainable transportation and infrastructure for all.

EVCA also agrees that these mechanisms should not be predicated on a specific business model or form of infrastructure; rather, funding mechanisms should promote maximizing the amount of charging. There are new and emerging business models and technologies that could drastically expand the reach and impact of California's EV charging infrastructure. However, many of these models are not eligible to participate in CEC charging projects because of outdated eligibility requirements, despite being a viable option to expand Californian's access to green and sustainable travel options.

Given the complexities of some of the proposed funding mechanisms, EVCA also respectfully encourages the CEC to simplify the parameters of these mechanisms to the furthest extent possible and provide examples of how they could work. In some cases, additional technical support to EVSPs to ensure they understand how to participate in such funding mechanisms

may be warranted. EVCA encourages proactive outreach by staff to work with industry stakeholders in order to mitigate overcomplex criteria and program design.

4. EVCA supports the CEC prioritizing charging solutions that supports load management, grid planning and vehicle to grid integration while reducing overall capital costs to upgrade transmission and distribution systems.

Once again, given the scale and pace of deployment needed to meet the state's climate, ZEV, and ZEV infrastructure deployment goals, the CEC and other state agencies must prioritize policies and solutions that maximize the potential for charging while reducing overall capital costs – both for charging stations and utility system upgrades.

The CEC is already well aware of technologies and business models that help promote this outcome – smart charging, vehicle to grid and vehicle to building technologies and software, wireless charging, and charging solutions that integrate renewable energy, to name a few. EVCA also strongly encourages the CEC to continue supporting technology deployment that helps leverage existing utility infrastructure and avoid larger distribution system upgrades. EVCA thanks the CEC for including the recommendation to work with local planners to identify strategic ZEV charging opportunities that are resilient to power outages and natural disasters, such as a distributed, resilient public charging network. In addition, we urge the CEC to provide funding mechanisms for off-grid charging solutions that can bring continuity to the state's charging network. This will help maximize the value of limited public and ratepayer dollars by using them to leverage additional private funds through business model and technology innovations.

We greatly appreciate the CEC's efforts on the Integrated Energy Policy Report and look forward to continuing to work with you. Thank you for your considerations of our comments and do not hesitate to contact us if you have any questions.

Sincerely,

Abdellah Cherkaoui
Chair, Electric Vehicle Charging Association