

DOCKETED

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EVCA Comments - CALeVIP 2021 Implementation Workshop

Additional submitted attachment is included below.



Electric Vehicle Charging Association

INNOVATION FOR CLEAN MOBILITY

March 23, 2021

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Docket: 17-EVI-01

RE: EVCA Comments on the CEC's March 2021 CALeVIP Implementation Workshop

The Electric Vehicle Charging Association (EVCA) thanks you for the opportunity to comment on the Energy Commission's (CEC) CALeVIP 2021 Implementation Workshop, which took place on March 11. EVCA is a not-for-profit trade organization of fourteen leading electric vehicle (EV) charging industry member-companies and one zero-emission autonomous fleet operator. 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.

Below, EVCA offers the following select comments and questions for consideration:

1. EVCA supports the program change allowing eligible costs to be incurred at time of program launch.

EVCA applauds the CEC's proposed rule change to allow eligible costs to be incurred starting at landing page launch. In order to meet the projected demand of 1.5 million chargers needed by 2030, outlined in the CEC's recent Assembly Bill (AB) 2127 Electric Vehicle Charging Infrastructure Assessment, programs like CALeVIP will be critical to accelerating shovel ready projects, including the Inland Counties project, which will begin launch in May. Currently, reservation and application processing can take months given the program popularity thus far. By allowing for viable, shovel ready projects to move forward, the state can expedite charger deployment and scaling of infrastructure in the state as the program processes reservations.

2. Please clarify ability for projects to receive rebates for non-EVITP certified contractors ahead of CEC-set deadline.

Per AB 841 (Ting), projects funded through the CEC must be completed with Electric Vehicle Infrastructure Training Program (EVITP) certified contractors beginning in January 1, 2022. The CEC elected to require the EVITP certification for projects by September 1, 2021, stating that applications/projects not meeting the requirement will not receive a rebate. Given that

applicants may now begin construction prior to being notified of their reservation, which can often take months in and of itself, we suggest that it be clarified that all construction done before the EVITP certification deadline be eligible for rebates and will not be disqualified from eligibility.

We greatly appreciate the CEC's efforts on the EVITP program 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,

Adam Mohabbat

Chair, Electric Vehicle Charging Association