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**GRID Alternatives, California Housing Partnership & Ecology
Action Comments to the CEC Recovery and Reinvestment Initiative**

Please see attached. Thank you for your consideration!

Additional submitted attachment is included below.



April 23, 2021

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

VIA DOCKET

Energy Commission Docket 21-TRAN-02

Re: 21-TRAN-02, California Energy Commission Recovery and Reinvestment Initiative

Dear Commissioners:

GRID Alternatives ("GRID"), the California Housing Partnership ("Partnership"), and Ecology Action submit the following comments regarding the Pre-Solicitation Workshop for the California Energy Commission Recovery and Reinvestment Initiative on April 12, 2021. Specifically, we are writing to propose a targeted investment in shovel-ready and rapidly-deployable EV charging infrastructure in multifamily affordable housing across California as an ideal approach to meeting the Commission's goals and guiding principles for this effort.

I. Multifamily Affordable Housing Proposal

In 2018, the Commission published the Clean Energy in Multifamily Affordable Buildings (CLIMB) Action Plan¹, in partnership with the California Air Resources Board (CARB), California Public Utilities Commission (CPUC), California Department of Housing and Community Development (HCD), and other state agencies. The plan calls for expanding investments into the multifamily affordable housing sector to deploy distributed energy resources, including EV charging infrastructure, through close collaboration between agencies and programs. The Recovery and Reinvestment Initiative creates an ideal opportunity to turn this plan into action, with investments that will provide clear, direct and measurable benefits to low-income Californians across the state who have been disproportionately impacted by the COVID-19 crisis. As described below, this proposal leverages key partnerships with other state agencies and programs, while complementing the Commission's existing infrastructure programming and advancing the Commission's equity goals in its 2020–2023 Investment Plan Update for the

¹ <https://efiling.energy.ca.gov/getdocument.aspx?tn=224513>

Clean Transportation Program.

Based on our organizations' extensive experience with affordable housing owners throughout California, we identify three core opportunities to deploy infrastructure quickly in this sector that the Commission could pursue in parallel to get funds out the door quickly. These include:

Targeting New Construction: Multifamily affordable housing providers ("providers") consistently identify new construction of affordable housing complexes as being the optimal time to incorporate EV charging infrastructure. However, there is minimal funding available for EV charging infrastructure that focuses on new affordable housing buildings. Further, existing EV infrastructure funding programs often don't align with the requirements and timeline of the overall housing financing and development process. We propose targeting housing developments that are actively under construction, and providing additive funding to make charging infrastructure financially feasible. Collaboration with nonprofits like the Partnership that work directly with multifamily affordable housing nonprofits on new developments can enable the Commission to rapidly identify a subset of new affordable housing developments that would align with this strategy.

Offering Flexible Infrastructure: To avoid delays related to building infrastructure and transformer upgrades that can be required to accommodate EV charging, we propose offering providers the option to incorporate flexible charging infrastructure technologies that reduce or even eliminate the need for these upgrades entirely. These include storage-integrated EV charging products from companies like BEAM/Envision Solar and Freewire Technologies, designed from the ground up for rapid deployment, as well as load-managed EV charging products designed for use with existing multifamily electrical infrastructure from companies like EverCharge. This approach would unlock quick investments for charging infrastructure at existing housing developments, while also providing maximum flexibility for the new construction opportunities identified above. These projects will also serve as powerful case studies of innovative strategies to unlock EV charging in this critical sector and help guide future investments.

Integrating with Solar Installation: Finally, the Commission could partner with programs like the CPUC's Solar on Multifamily Affordable Housing (SOMAH) program² to support integrating EV charging with existing renewable energy infrastructure and funding. The Commission could offer affordable housing developments already planning to install solar photovoltaic systems additional funding to add EV charging infrastructure at the same time. Like with new construction, this offers a shovel-ready project pipeline of developments that are pursuing a resyndication or a major capital improvement. This also creates opportunities to leverage financing and improve construction efficiencies, particularly for complexes planning to install solar carports in parking lots.

² <https://calsomah.org/>

We are proposing a single investment program that targets the most shovel-ready, streamlined developments across all three of these strategies, to get funding out the door and into low-income communities as soon as possible to support economic recovery from the COVID-19 pandemic.

II. Alignment with the Commission's Guiding Principles & Proposed Priorities

This proposal is unique in its ability to pair the Commission's guiding principles of "Speed of Deployment" and "Equity", which often are at tension with each other. In addition, these projects can use established models from SOMAH and other equity programs to integrate job creation and workforce development for the community into every project. From an economic development perspective, targeted investments in charging infrastructure in affordable housing can help nonprofit housing providers generate ongoing revenue streams from EV charging. This revenue can lead to long-term affordable housing preservation and improved resident services, while simultaneously helping residents generate major savings by enabling them to reduce costly gasoline expenditures.

This proposal also offers the Commission excellent opportunities to achieve its proposed priorities for complementing other state incentives. The Commission can leverage its dollars with existing programs such as the CPUC's SOMAH program; recently expanded utility charging infrastructure investments such as Southern California Edison's Charge Ready 2 and San Diego Gas & Electric's Power Your Drive 2 programs; the Affordable Housing and Sustainable Communities (AHSC) program administered by HCD for the Strategic Growth Council; and the upcoming BUILD program being implemented by the Commission and the CPUC³. These collaborations with existing programs will also advance the Commission's goals to support integration with renewable resources. The three strategies above also align naturally with the Commission's proposed priority of leveraging private capital, by targeting affordable housing that is either being newly constructed, or is going through a resyndication or major capital improvement.

Most critically, the Commission can collaborate directly with CARB to pair these investments in charging infrastructure for affordable housing providers with simultaneous outreach to tenants for CARB's ecosystem of EV equity incentive programs through Access Clean California, the state's "one stop shop" outreach program called for by both CARB SB 350 Barriers Report⁴ and the Commission's SB 350 Barriers Study⁵. This collaboration will not only leverage additional dollars, it will address the biggest barrier to successfully implementing EV charging at multifamily affordable housing - the "chicken and egg" problem: multifamily affordable housing property owners are hesitant to invest in charging infrastructure when their tenants don't drive

³ <https://www.cpuc.ca.gov/buildingdecarb/>

⁴ <https://ww2.arb.ca.gov/resources/documents/carb-barriers-report-final-guidance-document>

⁵ <https://www.energy.ca.gov/rules-and-regulations/energy-suppliers-reporting/clean-energy-and-pollution-reduction-act-sb-350/sb>

EVs, and low-income tenants are hesitant to purchase EVs because they can't charge them at home. This proposal addresses this challenge by providing affordable housing communities with a comprehensive package of infrastructure funding from the Commission and vehicle funding from CARB. As the statewide administrator for Access Clean California, GRID is well positioned to help facilitate this collaboration.

Thank you for the opportunity to provide input on this exciting and much-needed equity program. We look forward to collaborating with the Commission to ensure that low-income Californians have robust and equitable access to electric vehicle charging infrastructure.

Sincerely,

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