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AEE Comments on SB 1000 EV Charging Infrastructure Deployment Assessment

Additional submitted attachment is included below.

July 22, 2021

California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Re: Docket 20-TRAN-02 – Senate Bill 1000 Staff Workshop

Dear Commissioners:

Advanced Energy Economy (AEE) respectfully submits these comments in response to the California Energy Commission's (CEC) July 8 Senate Bill (SB) 1000 Staff Workshop inviting stakeholder comment on proposed design modifications. AEE strongly supports the CEC's transportation electrification (TE) objectives and recognizes the importance of SB 1000 in supporting the equitable infrastructure deployment goals considered in the CEC's recent Assembly Bill (AB) 2127 Electric Vehicle Charging Infrastructure Assessment. We thank the CEC for the opportunity to comment and look forward to the agency's continued leadership in supporting TE.

First, we commend the CEC's efforts to model driving times to public direct current fast charging (DCFC) infrastructure as a lens to assess equity in the deployment of EV chargers in low-income, disadvantaged, and rural communities. Ensuring that a network of stations are accessible where residents of these communities live, work, and play will be critical to supporting a broader, more diverse EV market that aligns with the state's policy goals. Drive time to a charger is also more accurate metric than distance to a charger in terms of assessing drivers' EV charging experience. We support the consideration of drive times in future CEC solicitations for EV charging infrastructure and look forward to supporting the CEC in incorporating this metric into future CEC EV infrastructure projects.

AEE submits that housing type may also be a salient factor in determining where incremental DCFC infrastructure may be most valuable. As the CEC appropriately noted in its AB 2127 report, EV charger access issues are particularly acute for multi-unit dwelling residents in communities who will likely rely on public DCFC infrastructure more than other drivers. In

other words, communities that are predominately detached single-family homes may be able to meet much of their charging needs via residential charging – potentially diminishing the need for DCFC infrastructure relative to a community with more MUD housing. Considering housing type may allow the CEC to better target future incentive projects in areas that need near-term support to accelerate TE via fast charging.

Resources permitting, it may also be valuable for the CEC to assess drive times to all publicly available level 2 (L2) chargers – particularly those sited in locations that are likely to be long dwell-time locations like workplaces. Such analysis can provide a more complete picture of EV charging networks in priority communities and help sharpen the focus on where new DCFC infrastructure deployment could provide greater incremental value.

AEE thanks the CEC to provide feedback on its SB 1000 Staff Workshops and looks forward to coordinating with the CEC on future efforts to accelerate TE for all drivers.

Respectfully submitted,

/s/ Noah Garcia

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