

DOCKETED

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EVCA Comments Electric Vehicle Charging Infrastructure for Light-Duty Vehicles

Additional submitted attachment is included below.



Electric Vehicle Charging Association

INNOVATION FOR CLEAN MOBILITY

December 21, 2021

California Energy Commission
Fuels and Transportation Division
1516 Ninth Street
Sacramento, CA 95814
Docket: 20-TRAN-04

**Re: EVCA Comments on Light-Duty Electric Vehicle Infrastructure
Allocation Workshop**

The Electric Vehicle Charging Association (EVCA) appreciates the opportunity to comment on the Energy Commission's (Commission) Light-Duty Electric Vehicle Infrastructure Allocation Workshop.

Founded in 2015, the EVCA is a not-for-profit organization that brings together leaders throughout the value chain of the electric vehicle charging industry 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.

EVCA commends the Commission's work to make California's zero emission vehicle (ZEV) and charging infrastructure goals, including 1.2 million charge ports by 2030, a reality. EVCA believes that the Commission's Clean Transportation Program, augmented by the state's historic ZEV package, is one of the strongest tools in helping the state meet these goals.

With respect to the Commission's workshop on light duty programming for the next year, please find the select comments below:

I. We respectfully recommend the Commission de-prioritize DCFC corridor charging until federal funding is exhausted.

The Commission is aware the state's Department of Transportation (Caltrans), state, through the Department of Transportation (Caltrans), will receive approximately \$3830 million from Bipartisan Infrastructure Package the federal government to primarily deploy corridor charging over five years. Given the number of competing needs to deploy chargers across the state, we encourage the CECC Commission to prioritize providing technical support and assistance to Caltrans to administer these federal funds first in the short term before using any of its own funding for corridor charging. While there are likely additional gaps to fill along corridors that federal funding will not cover, it's critical for the Commission to work to address multiple EV charging use cases, especially those not being covered by other funding sources.

Finally, as the Commission considers prescribing power levels for DCFCs, EVCA recommends setting a floor at 50 kW and instead of requiring, reward higher powering charging for the right use cases (e.g. 100 kW and above). While we recognize and support the value of high-powered charging (e.g. 150 kW, 350 kW), we believe it's important to give charging companies and site hosts the flexibility to right size charging solutions. Companies consider many factors when choosing the right power level – driver use case, expected dwell time, cost, local electrical capacity, to name a few – if the Commission prescribes power levels, it could unintentionally exclude sites well suited for charging, but can't or are unfit to support high-powered charging.

II. We strongly support dedicated rebates for local government fleet charging, but additional equity mechanisms should be included.

Cities are often at a disadvantage to pursue public funding opportunities because they have constraints other applicants might not – lack of resources and staffing continue to be immense limiting factors. Developing programs dedicated to local governments could help their ability to access funds immensely. We support a rebate model, like CALeVIP, specifically for local governments to access on a first-come, first-served basis.

However, not all cities are a monolith, and some still have more resources than others. To ensure more equitable access to any Commission funds, we also encourage the Commission to allow cities that meet specified criteria (in a disadvantaged or rural community, cities of a certain size, for instance), to be allowed more time to submit applications for rebates. We encourage the Commission to consider mechanisms like what it is contemplating in the design of EnergiIZE to account for more equitable access. Finally, public charging should be eligible in a local government rebate program; cities should not be precluded from procuring a specific kind of charging. Should a city want to deploy public chargers that can also serve its fleets, this maximizes the value of the Commission's investment by providing more public access to chargers and thus enabling higher utilization.

Conclusion

EVCA remains committed to working with the Commission as it implements its plan to build EV charging stations throughout California. The State has an opportunity to

continue leading the country in transportation electrification and ensuring that drivers feel the health and economic benefits of a fully electrified transportation system. lead the country as an example and of how ensure California meets its transportation and climate goals.

Thank you for your consideration,

Dylan Jaff
Electric Vehicle Charging Association Government Affairs