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EVgo Comments on CALeVIP 2 - Block Grant for Electric Vehicle Charger Incentive Projects

Additional submitted attachment is included below.

May 19, 2022

Ms. Patricia Monahan
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

RE: EVgo Comments on Block Grant for Electric Vehicle Charger Incentive Projects, CALeVIP 2.0

Dear Commissioner Monahan and Staff:

EVgo commends the California Energy Commission (CEC) for its continued leadership in supporting California's climate and zero emission goals through thoughtful, sustained investment and programs, including its Clean Transportation Program (CTP). The CEC's CTP activities are paramount to meeting the state's climate and zero emission vehicle (ZEV) goals through sustained and equitable investments in EV charging infrastructure.

With more than 850 fast charging locations, EVgo is the nation's largest public fast charging network for electric vehicles, and the first to be powered by 100% renewable energy. Headquartered in Los Angeles, EVgo's owned and operated network includes more than 300 fast charging locations in California and serves over 60 metropolitan areas across more than 30 states and approximately 375,000 customer accounts.

EVgo thanks the CEC for continuous engagement with EV service providers (EVSPs) to collect feedback and update the program to reflect EV charging market developments and driver needs. The initial program design presented at the May 2022 public workshop shows marked program design improvements built on key lessons learned from CALeVIP 1.0 that will allow more efficient reservation processing and therefore more rapid deployment of charging infrastructure. Along with the upcoming federally funded National Electric Vehicle Infrastructure (NEVI) program allotment to California, CALeVIP and the Clean Transportation Program remain the state's strongest tools to accelerate EV charging infrastructure deployment and meet the state's goals for 100% ZEV sales beginning in 2035, and 1.5 million charge ports by 2030.[1] [2]

As the CEC and respective partners finalize CALeVIP 2.0 program design, EVgo respectfully suggests the following recommendations as solicitated by staff. EVgo looks forward to being a partner to the CEC in pursuit of a fully electrified transportation sector and welcomes itself as a resource should any questions arise.

Best,

Adam Mohabbat
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[1] *Executive Order N-79-20,* https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf
[2] *Assembly Bill 2127 Electric Vehicle Charging Infrastructure Assessment - Analyzing Charging Needs to Support Zero-Emission Vehicles in 2030 (Commission Report),* California Energy Commission, July 2021.

1. **EVgo strongly supports the proposed updated Tiered Application system concept to prioritize shovel ready projects.**

EVgo applauds the move beyond first come, first serve to a tiered system which prioritizes ready-to-build projects, expediting infrastructure deployment and focusing on projects with the highest likelihood of success. The first come, first serve method used in CALeVIP 1.0 was likely the largest obstacle to efficient deployment of funds, with the method leading to leading to clogged queues, extended waitlists, and uncertainty of outcomes. EVgo has experienced delays in processing applications up to 16 months in CALeVIP due to oversubscription, compared to 2-3 months for most competitive funding solicitations across the country. Even today, EVgo has dozens of shovel ready projects that are waiting in the CALeVIP 1.0 queue due to overwhelming numbers of incomplete or unviable placeholder reservations. EVgo supports the three separate tiers proposed for CALeVIP 2.0, separated out by the completeness of the application and ability to provide evidence of shovel-readiness. By switching to a tiered application system that places 'ready to build' sites at the front of the queue and randomizes the applications within tiers, the CEC more appropriately balances the priorities of rapid deployment, access, and fast and efficient processing.

2. **For the Tier 1 and Tier 2 requirements, change the "Issued Permit" requirement to "Proof of Filed Permit."**

Despite measures taken in California taken to address permitting timelines – including AB 1236, AB 970, and the Governor's Office of Business and Economic Development's (GO-Biz) Permitting Guidebook – implementation of streamlined permitting has been widely uneven.[3] As such, the requirement for an issued permit to be viable for Tier 1 or Tier 2 categories of the application period, while well intentioned, may be an unduly difficult barrier and inadvertently further concentrate funding based on regions where permit approvals are quickest. Thus, EVgo recommends that applicants instead be required to show proof that they have filed their permit. Showing evidence of a filed application, along with the other requirements of site verification forms and final utility design sufficiently show the readiness of a site and applicant.

3. **The CEC should use Region Concept 3 (Geographic) to deploy funds more efficiently.**

EVgo commends the CEC for its commitment to 50% of Clean Transportation Investments going to disadvantaged communities (DAC) and low-income communities (LIC). The need to ensure that all communities are included in the transition to an electrified transportation system is paramount, and a goal strongly shared by EVgo. Of the three project concepts presented in the workshop, the statewide approach split by geographic regions best balances the needs of rural communities and needs for urban charging. EVgo commends the work the CEC has done to identify and serve the gaps. One such gap noted was the shortage of public charging in high density areas as opposed to low density areas.[4]

Notably, up to 81% of apartment-dwelling EV drivers and others without access to home charging or onsite parking rely primarily on public charging.[5] As seen below, a UCLA Luskin Center study had similar findings,

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[3] Governor's Office of Business and Economic Development, Electric Vehicle Charging Station Permitting Guidebook, July 2019, https://businessportal.ca.gov/wp-content/uploads/2019/07/GoBIZ-EVCharging-Guidebook.pdf

[4] California Energy Commission, California Electric Vehicle Infrastructure Deployment Assessment Senate Bill 1000 Report, December 2020, available at https://efiling.energy.ca.gov/GetDocument.aspx?tn=236189&DocumentContentId=69167

[5] International Council on Clean Transportation, Quantifying the Electric Vehicle Charging Infrastructure Gap Across U.S. Markets, January 2019, page 9; available at Https://theicct.org/sites/default/files/publications/US_charging_Gap_20190124.pdf

concluding that a large plurality of multi-unit dwelling residents rely on public DC fast chargers. [6] EVgo commends the CEC's recent multi-unit dwelling centered solicitation, REACH, for both its goal and recognition that a combination of nearby DCFC and L2 will be needed to provide charging options for apartment dwellers and recommends that the CALeVIP 2.0 program build on these efforts in a complementary fashion.

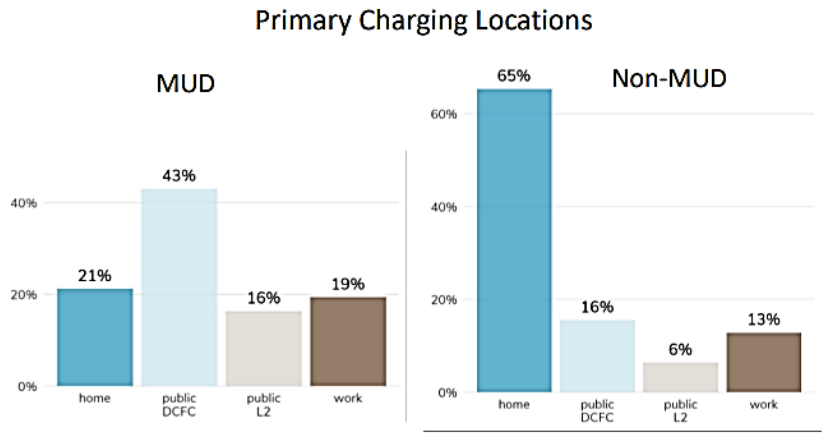

Figure 1: Primary charging location for MUD and Non-MUD Drivers. Source: UCLA Luskin Center Study

4. The CEC should launch the Standard Program first, followed by the DAC Program.

Given that a full year will have passed between the most recent CALeVIP DCFC solicitation and the launch of CALeVIP 2.0, there will be large pent up market demand for the rebate. To both address this demand and address the needs of priority communities, EVgo recommends that the CEC release the Standard Program first in Q4 2022, followed by the DAC specific projects in early 2023. By the program's very nature, many of the project applications in the Standard Project will be sited in DAC and LIC geographies. Following the Standard Project, the DAC Project will be able to identify and cater to specific gaps and provide a more informed pathway to deploy DCFC coverage in these priority communities.

5. EVgo supports a 100 kW minimum power rating for CALeVIP 2.0; the CEC should reward, but not require, higher power charging with a higher incentive.

While 50 kW has traditionally been the minimum for DCFC programs, the market is seeing power sharing configurations become more common and vehicle battery technology continuing to evolve, allowing for higher power charging. Charging programs should adapt to this market change and reward higher power charging in light duty programs. EVgo recommends a new 100 kW charging speed minimum for CALeVIP 2.0 funding eligibility. 100 kW EVSE are more cost efficient than 150 kW as well as more accommodating of both CCS and CHAdeMO connector types. 100 kW chargers are more cost efficient than 150 kW as well as more accommodating of both CCS and CHAdeMO connector types, the latter of which does not in practice have support above 100 kW at this time. Although CHAdeMO is not a required connector type for CALeVIP 2.0, by maintaining 100 kW as the minimum, CEC preserves optionality for all connector types.

[6] University of California at Los Angeles, Luskin Center for Innovation, Evaluating Multi-Unit Resident Charging Behavior at Direct Current Fast Chargers, January 2021, https://innovation.luskin.ucla.edu/wp-content/uploads/2021/03/Evaluating-Multi-Unit-Resident-Charging-Behavior-at-Direct-Charging-Behavior-at-Direct-Current-Fast-ChargersCurrent-Fast-Chargers.pdf

Further, EVgo supports incentivizing, but not requiring, higher power charging beyond 100 kW. The CEC can do so by awarding additional points on applications to higher power charging proposals instead of requiring it as the standard. An example of this best practice can be seen in Maryland's Appendix D program, where 100 kW was the minimum requirement in outlying counties but additional points were awarded to applications with higher power levels.[7]

6. **For the DC fast charging program, the CEC should shorten the proposed application window from 30 days to 7 days and prepare the market for successful application periods through transparent, concrete, and predictable project timelines.**

While the proposed program design suggests a 30-day window for the applications, EVgo recommends a 7-day application period. Unlike more general programs that include Level 2 charging and DC fast charging, one of the benefits of splitting the technologies into two distinct programs is the ability to move more expeditiously to reflect the nature of the DC fast charging market. The vast majority of applicants for the DC fast charging program will be experienced developers who have the sophistication and will have spent months building a pipeline of viable sites for application. Further, as noted above, there will have been almost an entire year between CALeVIP 1.0 projects and the launch of CALeVIP 2.0 under the current projections. The CEC should take every opportunity to expedite the launch and release of the funds. By shortening the application window to a week, the CEC accomplishes expediency while still improving the, in effect, minutes-long windows from CALeVIP 1.0 projects that did not work efficiently to accomplish the shared goals of the CEC and the private sector.

To help businesses prepare and successfully apply to the CALeVIP program, the CEC can provide transparency and predictability through clearly communicated and adhered to launch and review timeframes. By doing so for CALeVIP 2.0, applicants can plan their siting and proposal efforts around these project launch dates, ultimately leading to more shovel-ready projects and reduced attrition, further accelerating deployment. Given that each project (Standard and DAC-specific) will have 2 windows per year, EVgo recommends that the CEC pick four fixed dates for the program launches and announce those dates well in advance of their application periods opening. Similar to the CEC, Colorado Energy Office administers multiple charging infrastructure funding rounds per year. Their flagship program, Charge Ahead Colorado, typically has three application rounds per year in January, May, and October, providing industry with certainty and predictability in schedule. [8]

7. **EVgo applauds the elimination of the single Tax Identification Number (TIN) Applicant cap.**

EVgo commends the removal of the TIN-cap from CALeVIP 2.0's design and, in line with previous comments to the CEC, believes that the removal of the TIN cap in future programs will enable experienced market participants to scale deployment efforts and maximize the impact of the block grants. There are a variety of business models within the EV charging industry, and while each model engages with a particular site host in each deployment, the customer on record can look different for each model. The TIN cap unintentionally limited the participation

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[7] Guidelines for Maryland Electric Corridors Grant Program, Maryland Energy Administration & Maryland Department of the Environment, https://mde.maryland.gov/programs/Air/MobileSources/SiteAssets/Pages/MarylandVolkswagenMitigationPlan/Electric%20Corridors%20Grant%20Program%20Framework.pdf

[8] Charge Ahead Colorado, Colorado Energy Office, https://energyoffice.colorado.gov/zero-emissionvehicles/charge-ahead-colorado Pennsylvania and the Maryland Energy Administration have taken a similar approach with multiple, predictable funding rounds. For more information on funding best practices, see: connect-the-watts_public-funding-best-practices.pdf (evgo.com)

of owner-operators. This proposed change will allow more equitable participation for more business models and further promotes competition within the burgeoning charging industry.

8. **EVgo supports the increase in site DCFC cap size to 6 and recommends the CEC revisit the maximum cap as EV adoption continues to accelerate.**

In CALeVIP 1.0, projects had a maximum of 4 chargers per site applications. As vehicle adoption increases, especially amongst those without access to home charging, sites may need more than 4 chargers in order to adequately serve drivers. Redundancy has value for charger availability, reliability, and visibility for current and future EV drivers. From both an availability and reliability standpoint, redundancy is a positive. Accordingly, EVgo supports the increase of the cap from 4 to 6 EVSE per application and would recommend that CEC examine increasing the cap further, or eliminating altogether, the max caps for single site eligibility as noted in previous comments. There is precedent for such an approach to per site DCFC caps, including in the CEC's recent CARTS and REACH solicitations, as well as Bay Area Air Quality Management District's (BAAQMD) *Charge!* program. [9] [10] [11]

Conclusion

EVgo thanks the CEC for consideration of its program design recommendations as it finalizes its plans for the CALeVIP 2.0 rebate program. EVgo looks forward to being a partner to the CEC in pursuit of a fully electrified transportation sector and welcomes itself as a resource should any questions arise.

[9] *Charging Access for Reliable On-Demand Transportation Services (CARTS),* CEC, https://www.energy.ca.gov/solicitations/2021-08/gfo-21-601-charging-access-reliable-demand-transportation-services-carts

[10] *Reliable, Equitable, and Accessible Charging for multi-family Housing (REACH*), CEC, https://www.energy.ca.gov/solicitations/2021-11/gfo-21-603-reliable-equitable-and-accessible-charging-multi-family-housing

[11] *Charge! Program,* Bay Area Air Quality Management District (BAAQMD), https://www.baaqmd.gov/funding-and-incentives/businesses-and-fleets/charge