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**17-EVI-01 EVCA Comments on CEC's CAlEVIP 20 Design  
Workshop**

*Additional submitted attachment is included below.*



**Electric Vehicle Charging Association**  
INNOVATION FOR CLEAN MOBILITY

May 20, 2022

Mr. Brian Fauble  
Energy Commission Specialist II  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814  
Docket: 17-EVI-01

**Re: 17-EVI-01 EVCA Comments on CEC's CALeVIP 2.0 Design Workshop**

Dear Mr. Fauble,

Thank you for the opportunity to comment on the CEC's CALeVIP 2.0 program design as CEC and Center for Sustainable Energy (CSE) staff finalize the programs ahead of the 2022 program launch.

Founded in 2015, the Electric Vehicle Charging Association (EVCA) is a not-for-profit trade association dedicated to accelerating transportation electrification through innovation, competition, and customer experience. EVCA is comprised of 16 companies, with 9 headquartered in California alone, from across the EV charging value chain, including designing, manufacturing, installing, owning, operating, and repairing EV charging software, hardware, and services. Our member's charging stations cumulatively comprise more than half of networked charging infrastructure installed in the United States.

Informed by our collective expertise designing and deploying charging stations, EVCA and its members offer the following technical guidance for the Commission's consideration:

**I. EVCA recommends setting 50kW as the minimum threshold for DCFC power levels across both rural and urban use cases.**

EVCA recommends a 50kW EVSE power rating minimum for the upcoming DCFC solicitation for CALeVIP 2.0, and strongly encourages higher incentives for higher power chargers. Given the state's ambitious goals to deploy 1.2 million chargers in support of the 2035 target to phase out the sale of new internal combustion engine vehicles, the state should encourage as much participation of companies' technologies and business models through inclusivity to power levels as possible in incentive programs while balancing an evolving market and positive customer experience. This ultimately helps the entire industry scale up, reducing costs for all Californians. We encourage the Commission to revisit this topic in 2023 as the market and technologies continue to mature.

**II. EVCA recommends a two-week application window, but with a 30-day minimum notice of when the window goes live.**

Given the significantly higher power level of DCFCs compared to Level 2 stations, they can be more complex to permit and get utility design applications approved for, especially if the local

government is not as familiar with the technology. Since the Commission is piloting a new system for collecting and processing applications, with increased documentation requirements, we encourage the Commission to have a two week application window with a 30-day minimum notice of when a window goes live. This gives applicants adequate notice, especially for startup or scaling-up charging companies that have less staffing capacity to quickly and efficiently interface with local entities to complete these documentation requirements.

### **III. EVCA recommends site design flexibility and inclusive funding around co-located public and fleet charging.**

As the CEC and CSE develop program design requirements for CALeVIP 2.0, EVCA recommends a more inclusive approach to infrastructure deployment strategies and business models, including infrastructure that serves electric autonomous vehicles fleets and Transportation Network Companies. Under CALeVIP 1.0's rules, many ride-hailing fleet applications were allowed in the Level 2 space, but were ineligible in the DCFC space due to behind-the-fence charging requirements, despite the fact that these chargers exclusively serve the public. Since CALeVIP 1.0's initial design, there have been several evolutions in the electrification policy space - including the pending Clean Miles Standard, the CEC's leadership in creating the Charging Access for Reliable On-Demand Transportation Services (CARTS) grant program, and a growing emphasis on expanding more equitable access to clean miles for the public.

Given the potential benefit that shared electric fleets present for California's clean transportation goals - particularly in expanding the public's access to clean miles regardless of EV ownership or access to a charger - EVCA recommends the CEC adjust its design requirements to allow for private DCFCs that are co-located with public DCFCs to also be eligible for funding (as seen in the CARTS grant). This change will enable the CEC to capitalize on the tangible benefits of these business models that align directly with CALeVIP 2.0 goals, including rapid deployment (particularly due to predictable charging needs), high charger utilization, and increased public access to clean transportation, all strengthening the economics for large DCFC installation sites.

### **IV. EVCA recommends organizing funding rounds by geographic regions.**

Despite the state's immense progress deploying charging stations, many communities still lack enough convenient, reliable, and accessible public chargers to serve drivers, particularly in urban low-income and disadvantaged communities. Organizing the funding rounds by geographic region provides two key benefits: (1) it targets funding where the greatest need is to serve drivers, both from an EV population density perspective and equity perspective; of course, in keeping with previous incentive program design features, we recommend the Commission reserve 50 percent of funds each round for low-income and disadvantaged communities to guarantee they directly benefit, with higher rebates provided for chargers deployed in these areas. (2) applicants can concentrate their resources and staff in a more organized way through a traditional regional organization format. The other proposed organizational formats (DCFC need, urbanization) may be harder to interact with because it will force applicants to spread out their resources in a more diffuse way as they work with a much greater breadth of local governments and utilities to plan projects and complete their documents.

We look forward to collaborating with the CEC and CSE to develop a successful program.  
Thank you for your consideration.

Reed Addis  
Government Affairs  
Electric Vehicle Charging Association