

DOCKETED

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Document Title:	RCRC Comments, California's Deployment Plan for NEVI
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RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

June 28, 2022

California Energy Commission
ATTN: Hannon Rasool
Deputy Director, Fuel and
Transportation Division
715 P Street
Sacramento, CA 95814

California Department of Transportation
ATTN: Tony Dang
Deputy Director, Sustainability
1120 N Street
Sacramento, CA 95814

RE: California's Deployment Plan for the National Electric Vehicle Infrastructure Program

Submitted electronically to Docket No. 22-EVI-03

Dear Messrs. Rasool and Dang,

On behalf of the Rural County Representatives of California (RCRC), we appreciate the opportunity to offer comments on *California's Deployment Plan for the National Electric Vehicle Infrastructure Program* (State Plan). RCRC is an association of thirty-nine rural California counties and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties.

RCRC is doing its part to strategically position our counties for the future of transportation as well as advocate for safe, reliable and affordable energy, ensuring rural towns can serve the needs of their residents, businesses, and visitors to drive economic recovery and growth. Though significantly under-resourced, many of our counties are working to streamline local permitting processes for electric vehicle (EV) infrastructure. Our organization is working on providing technical assistance and other robust planning efforts to support and leverage successful projects as well as private partnerships. One of the biggest unmet needs for rural jurisdictions is the ability to fund EV infrastructure readiness plans. Without these readiness plans, including site strategies, most rebates, incentives and/or direct funding programs for charger development are unobtainable by local jurisdictions.

Existing and Future Conditions Analysis

We appreciate the routes nominated in the proposed Round 6 Alternative Fuel Corridors which, if designated by USDOT, will help fill critical gaps in more rural, inland

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regions. Given other cross-agency collaboration to deploy ZEV infrastructure and fulfill our clean transportation objectives, broadband capabilities—a necessity for point-of-sale transactions—should be co-located with electrical upgrades to achieve dual objectives.

EV Charging Infrastructure Deployment

RCRC supports prioritizing funding for segments that have infrastructure gaps, especially those that are remote, hard to reach, or may not otherwise attract private investment.¹ We understand the desire to expedite projects, however, many smaller jurisdictions that lack pre-requisite infrastructure will not achieve shovel-readiness without additional resources, including planning and technical assistance. First assessing and strategically planning for EV readiness is a critical step for rural communities. Because incentives, grants and direct funding provided by state and/or federal sources often require viable projects and pre-selected priority site locations, many unserved regions may not have the capability, let alone the competitive advantage, to unlock these opportunities. Moreover, utilizing traffic or projected demand may be a useful metric, but it could have unintended consequences as a prioritization method to reach into rural areas and achieve equity considerations.

Further, we caution against diverting funding opportunities in subsequent years to upgrade existing stations (i.e., to achieve Alternative Fuel Corridor “fully built-out” status) until greater statewide access is achieved in terms of the proliferation of EV charging infrastructure. We don’t dispute that a “quality” of fast-charging options needs to exist; however, rural California is struggling to access the “quantity” of chargers needed to support the transition to cleaner transportation. Any NEVI funds that get awarded to upgrade existing stations should be targeted to areas designated by Justice40, or California low income and/or disadvantaged communities.²

Implementation

We appreciate the cross-agency efforts to ensure publicly funded chargers are reliable and that ongoing Operations and Maintenance (O&M) will be a consideration during the application phase for grant funding. Stranded assets are a concern in rural communities where end-user adoption may be slow, and relatedly where private investment may be lacking. Local governments, especially rural counties, have finite resources and limited economies of scale. EV drivers that are ill-prepared to get to their destination because of poorly maintained or otherwise unavailable charging opportunities may present problems for local emergency responders where EVs are stranded during emergency evacuations or inclement weather (such as winter storm events), a frequent scenario throughout California.

Proper oversight of public charging is needed to ensure they remain reliable and are maintained in a timely fashion. Data sharing between private companies and local/state agencies should be encouraged, especially for private infrastructure using

¹ *California’s Deployment Plan for the National Electric Vehicle Infrastructure Program*, page 33-34.

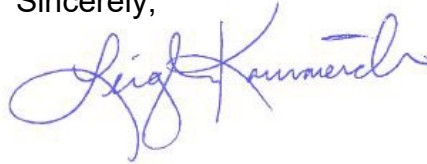
² *Ibid*, see Figure 6.

public subsidies. Given the need for real-time availability of public charging infrastructure, co-locating broadband infrastructure during energy system upgrades will be necessary, especially in traditionally underserved, rural locales. Stable funding sources have long presented a challenge with highway or bridge maintenance, and EV charging facilities in more rural and remote areas may not prove sustainable without long-term considerations.

Lastly, we appreciate the recognition that natural disasters and extreme weather events uniquely pose on an electrified transportation sector, and the resulting need to develop resiliency strategies. The need for reliable charging infrastructure in rural areas prone to wildfire exist at large, not just in a public transportation context.³ Given the forthcoming evolution of certain disaster preparedness techniques, including nascent battery swap capabilities, the state should consider prioritizing funding applications that contain resiliency measures and benefits, such as back-up power. This is especially crucial given the emphasis of deploying Electric Vehicle Supply Equipment along routes that lead to a treasure trove of recreational opportunities at our State and National parks, forests and beaches that enjoy millions of visitors per year.

Thank you for your consideration of our comments. Should you have any questions, please do not hesitate to contact me at lkammerich@rcrcnet.org.

Sincerely,



LEIGH KAMMERICH
Policy Advocate

³ Ibid, page 36.