

DOCKETED

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Comment Received From: Laura Renger
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CaIETC Comments re National Electric Vehicle (NEVI) Pre-Solicitation Joint Workshops

Additional submitted attachment is included below.



September 28, 2022

California Energy Commission
Re: Docket No. 22-EVI-05

Re: Comments re: National Electric Vehicle (NEVI) Pre-Solicitation Joint Workshops

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the National Electric Vehicle Infrastructure (NEVI) Pre-Solicitation Joint Workshops, hosted by the California Energy Commission (CEC) and Caltrans on September 7 and 8, 2022.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, autonomous electric vehicle fleet operators, and other industry leaders supporting transportation electrification.

CalETC largely supports the ideas presented in the September workshops regarding the proposed solicitation process. We have a few suggestions, listed below, to help ensure that the program is as successful as possible:

Early and frequent communication with utilities is imperative. CalETC supports the requirement that project applicants must engage the local utility to understand power capacity at a project site as well as the complexity of any necessary upgrades and supports the requirement for project applicants to obtain utility input in this process. It is important to note the utility will only provide an analysis of capacity at that particular point in time—it does not reserve or guarantee capacity for future use. The utility may only reserve capacity when the applicant makes a commitment and submits all of the appropriate project documents. In the process of obtaining utility input, CalETC encourages the CEC and Caltrans to require that project applicants utilize an already existing tool, as opposed to establishing a new procedure, in order to minimize administrative work for the utilities. Finally, CalETC strongly encourages the CEC and Caltrans to require all project applicants to engage with their local utility early in the process to ensure that there is ample time for the utility to provide the necessary support. The state agencies should also work with utilities to address site readiness assessment challenges and identify solutions that will better facilitate NEVI implementation.

CEC and Caltrans should prioritize applications that include private and public applicant teams and applications that will utilize Disadvantaged Business Enterprise (DBE) program participants. CalETC encourages CEC and Caltrans to heavily weight applications that include both public and private teams, as this will incentivize participation from municipal agencies. Successful electrification of the transportation sector will require full participation from a variety of stakeholders, including the private sector and the public sector/municipalities. CalETC encourages stronger positive weighting of applications that include municipalities to ensure that these stakeholders are a part of this process. CalETC also encourages stronger weighting of applications from DBE applicants. For many years, those residing in disadvantaged communities (DACs) have disproportionately borne the burden of air pollution caused by transportation emissions. Going forward, we must not only stop overly burdening DACs, but we must also prioritize funding for those from, and operating in, such communities. As such, CalETC supports heavily weighting applications from DBE applicants in the scoring process.

CalETC supports incorporating robust reliability requirements for awardees. Currently, the reliability of public charging infrastructure in the United States is one of the major barriers to adoption of electric vehicles. AB 2061 (Ting), signed by the Governor, will require more standardized uptime reporting to ensure EVSE reliability across all publicly funded programs. CALETC suggests that NEVI funding solicitations include this standardized reporting formula and reserves further comment on this topic for the subsequent workshop.

CalETC encourages adoption of a site-by-site application process in lieu of the corridor grouping concept. CalETC respectfully requests that the CEC and Caltrans consider an application process on a site-by-site basis as has been done successfully with other programs in the state, such as CaLeVIP, as a better alternative to the corridor grouping concept. Requiring a single applicant to have sufficient real estate available to meet all of the program requirements for a given grouping could be too onerous and may impair the success of California's NEVI program. On the contrary, a system of one application per site location better recognizes on the ground realities for real estate considerations and the partnerships necessary to make this program a success.

CalETC recommends the CEC and Caltrans coordinate between broader groups to avoid duplicative efforts. Where interstates and highways cross the border of two groups and especially where there is a city at or near the border of two groups, the awardees for those groups should coordinate to ensure charging stations are not installed right next to each other. Coordination between the awardees will ensure that charging stations are appropriately distanced and there is not unnecessary investment in infrastructure in one location.

CalETC urges the CEC to provide the public with data about the program in a timely manner.

Transparency of data collection is critical, and the public would benefit from having access to information such as the number of grant applications received by corridor group, the names of the applicants, the proposed number and location of charging stations, the utility with jurisdiction, and progress updates on installations and grant results. One way that this can be accomplished is through the creation and hosting of a data mapping dashboard which would align with NEVI's data collection and transparency requirements, allow stakeholders to provide feedback, and allow the CEC to propose adjustments for future funding plans.

Thank you for your consideration of our comments. Please do not hesitate to contact me laura@caletc.com should you have any questions.

Kind regards,

A handwritten signature in black ink, appearing to be 'Laura Renger', with a long horizontal line extending to the right.

Laura Renger, Executive Director
California Electric Transportation Coalition