

DOCKETED

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EVgo Comments on EV Charging Equipment Web Guide - 22-DECARB-02

Additional submitted attachment is included below.

October 5, 2022

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket No. 22-DECARB-02 – Building Decarbonization and Electric Vehicle Charging Equipment Web Guide

Dear California Energy Commission Staff,

EVgo welcomes the opportunity to provide input as the California Energy Commission (Energy Commission) develops a new webpage providing resources for building owners, the construction industry, and local governments to overcome barriers to building decarbonization and installation of electric vehicle (EV) charging infrastructure.

As the nation's largest public fast charging network, EVgo has over a decade of experience building charging infrastructure across California and the country. Building charging stations requires extensive coordination with the local governments and utilities responsible for issuing necessary building and electrical permits. These Authority Having Jurisdictions (AHJs) play a critical role in the scale and timeline of EV charger deployment. Cumbersome permitting processes and unfamiliarity with EV charging projects contribute to lengthy zoning and permitting timelines and are a major source of project delays.

In light of statewide efforts to streamline permitting for EV charging projects through Assembly Bills (AB) 1236¹ and 970² and significant state and federal investment in expanding charging infrastructure across California, it is important for AHJs and local stakeholders to have easy access to best practices and resources that will accelerate charger deployment. EVgo commends the Energy Commission's goal to provide a "one stop shop" web page for decarbonization resources pursuant to Senate Bill 68.³ In response to the Energy Commission's request for information, EVgo is pleased to provide the below recommendations and resources for consideration.

EVgo appreciates the opportunity to submit these resources for consideration, and looks forward to collaborating with the Energy Commission as it continues developing this important online tool for stakeholders.

Sincerely,



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¹ https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201520160AB1236

² https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB970

³ https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB68

Resources and Recommendations

1. EVgo Connect the Watts Initiative

Acknowledging the many stakeholders involved in building EV charging stations, EVgo launched the Connect the Watts initiative to bring the electric vehicle charging infrastructure community together to identify and implement best practices for charger deployment.⁴

Through this initiative, EVgo has published a series of best practice guides targeted to key stakeholders in the EV charger deployment process, including AHJs, site hosts, utilities, suppliers, contractors, and automakers. Each brief is freely available to the public and draws upon EVgo's decade-long experience building charging stations across the United States, citing specific challenges and actionable recommendations.

EVgo's briefs on permitting⁵ and utility⁶ best practices are particularly relevant to the Energy Commission's focus on providing resources to local governments, as well as ongoing efforts by AHJs to comply with statewide permitting requirements. AB 1236 and 970 have been tremendous first steps by requiring cities and counties to adopt streamlining ordinances and adhere to expedited permitting timelines for EV charging projects. As cities and counties adopt these ordinances and reform existing permitting practices, there is a significant need and opportunity to incorporate best practices into these new processes.

EVgo's permitting guide contains actionable recommendations to directly inform ongoing streamlining efforts. These include guidance on designing effective online permitting portals (which are required under AB 1236), investing in staff training, developing permitting requirements tailored to the unique needs of EV charging projects, and standardizing project reviews. Similarly, EVgo's guide for utilities offers guidance on accelerating energization timelines by simplifying the easement process, streamlining utility design approvals, improving feasibility studies, and investing in staff training.

By highlighting successful, on-the-ground examples across the country, the resources provided through Connect the Watts directly aid local governments and key stakeholders in overcoming obstacles to charger deployment.

While EVgo does not necessarily suggest linking to its Connect the Watts briefs on the upcoming webpage, EVgo does recommend that the Energy Commission look to these case studies, many of which are in California. These cases may serve as a starting point for research on permitting best practices that can be amplified and replicated throughout the state.

2. Additional Statewide Resources

In response to the passage of AB 1236 and AB 970, statewide agencies and organizations have made several resources available to local governments. The Governor's Office of Business and Economic Development (GO-Biz) maintains a web page⁷ dedicated to EV permit streamlining, including

⁴ <https://www.evgo.com/connect-the-watts/>

⁵ https://site-assets.evgo.com/f/78437/x/a36897f7b3/connect-the-watts_local-permitting-best-practices.pdf

⁶ https://site-assets.evgo.com/f/78437/x/dfe30bb392/071122_best-practices_utilities.pdf

⁷ <https://business.ca.gov/industries/zero-emission-vehicles/plug-in-readiness/>

information on the state legislation, a status map of jurisdictions that have or have not adopted streamlining efforts and a best practices section⁸ highlighting notable ordinances and permitting checklists from jurisdictions across California.

Alongside the GO-Biz best practices page, there are several key documents to assist local governments in meeting statewide permitting requirements:

- AB 1236 and AB 970 Fact Sheets: ⁹ GO-Biz provides a helpful two-page overview of the key provisions of the two statewide EV permitting laws, their associated permitting timelines, and key action items for jurisdictions.
- California Building Officials Toolkits: ¹⁰ The California Building Officials have published a series of toolkits with model ordinance templates to assist small and large jurisdictions in drafting and adopting permit streamlining ordinances.
- Permitting Guidebook: ¹¹ GO-Biz has published a Permitting Guidebook for local jurisdictions, which offers a detailed overview of the EV charging deployment process, defines key terms, and discusses the role of AHJs in the permitting EV charging stations. The Guidebook also includes best practices and recommendations to ensure compliance with the state's permitting requirements for EV charging projects.
- Permitting Checklist: ¹² GO-Biz has also published a condensed score card of action items necessary for cities and counties to comply with AB 1236 and AB 970. This checklist is also the methodology by which GO-BIZ evaluates "EV Permit Ready" scores for jurisdictions (green, yellow, red).

Though not an exhaustive list, the publicly available resources above provide useful guidance and best practices to help local governments accelerate the buildout of EV charging infrastructure and comply with statewide EV permitting laws. As such, collaboration with GO-Biz is paramount in this effort.

⁸ <https://business.ca.gov/industries/zero-emission-vehicles/plug-in-readiness/permitting-electric-vehicle-charging-stations-best-practices/>

⁹ <https://static.business.ca.gov/wp-content/uploads/2021/11/EV-Charger-Permit-Streamlining-AB-1236-Fact-Sheet-Version-1.pdf>

¹⁰ See AB 1236 Electric Vehicle Charging Station Tool Kit under "Documents" at: <https://www.calbo.org/post/electric-vehicle-charging>

¹¹ <https://static.business.ca.gov/wp-content/uploads/2019/12/GoBIZ-EVCharging-Guidebook.pdf>

¹² https://static.business.ca.gov/wp-content/uploads/2020/01/Permitting-Electric-Vehicle-Charging-Stations-Scorecard_Updated_8-12-2022.pdf