

DOCKETED

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*Comment Received From: Chargie LLC
Submitted On: 10/24/2022
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Assigned Parking Requirement

Additional submitted attachment is included below.

October 19, 2022

CALSTART
48 S Chester Ave
Pasadena, CA 91106

California Energy Commission
715 P Street
Sacramento, CA 95814

Subject: Charge Comments on CALSTART Communities in Charge EV Infrastructure Incentives – Docket No. 22-EVI-02

To Whom it May Concern:

Charge appreciates the opportunity to provide the following comments regarding the CALSTART and California Energy Commission's Communities in Charge Program site requirement below:

"All chargers must be shared and may not be assigned or otherwise allocated to any one individual."

Our team suggests removal of this requirement based on the following observations:

1. Various programs that included this requirement in the past have since removed it. Two examples we can cite are programs from Sacramento Municipal Utility District and San Diego Gas and Electric – both removed the requirement due to the barrier it presented for prospective applicants.
2. Other programs that include this requirement have had issues allocating funding to projects. One example is CALeVIP (SMUD), which despite launching in 2018, still has funds remaining. Charge has submitted installation projects that were denied by CALeVIP due to this requirement.
3. Successful programs from major utilities in the state, including Southern California Edison and the Los Angeles Department of Water and Power, do not include this site requirement.
4. Disadvantaged and Low-Income Communities often do not have surplus parking or guest spaces, meaning the communities we are targeting most will often be ineligible for funding.
5. From our experience, 90% of MUDs have assigned parking. This requirement would disqualify a large number of properties from consideration.
6. If the concern is ensuring charger availability for EV owners, most, if not all, parking is re-assignable by property managers to accommodate this. In addition, installers are able to place chargers in between spaces to maximize availability.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'CV', with a stylized flourish extending to the right.

Chris Vargas
SVP, Government Affairs
Chargie