

DOCKETED

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Green Water and Power Comments and Questions

Additional submitted attachment is included below.



October 25, 2022

CALSTART
48 S Chester Ave
Pasadena, CA 91106

California Energy Commission
715 P Street
Sacramento, CA 95814

To whom it may concern;

Our firm has installed over 3,000 Level 2 and Level 3 EV chargers and has participated in multiple Electric Vehicle charger incentive programs nationwide since 2017. We would like to first take the opportunity to thank the CEC, Grid Alternatives, CalStart and TetraTech for your continued support of EV charger incentive programs and for your work on the Communities in Charge (CinC) program. We appreciate the opportunity to provide the following comments and we thank you in advance for reading.

We are writing to let you know our following positions. We support adding "Workplaces in Charge" as a Community Connection. However, we also feel strongly that leaving HOA's off the Community Connection list is a mistake. We work with many HOA's in DAC and LIC areas – and we often have more success in seeing projects come to fruition when they are HOA's/Condos as opposed to rental apartments. In addition, we urge you to consider adding more Community Connections such as parks, sports facilities, parking in proximity to airports, ports and other areas with significantly high pollution.

We recommend there should be no limit to the number of applications that any contractor/entity can apply for. If it is necessary to implement some cap, we recommend that different limits be applied depending on the track record of the applicant. For example, a contractor with significant experience (up to your determination) should be allowed to apply for unlimited applications whereas an electrical contractor new to EV chargers be limited in their application quantity.

There are certain jurisdictions in California whereby getting permits issued can take up to six months. These jurisdictions include but are not limited to the City of San Jose, City of Oxnard, City of Ventura, County of Ventura, City of San Diego, and City of Simi Valley. We highly recommend that you consider allowing permit applications with payment receipts coupled with fully executed contracts between contractor and site host to qualify for Tier 1 readiness. Not doing so, would likely result in underdevelopment of chargers in these regions. As evidence please take into account the funds remaining in City of San Jose tranche of CalEVIP L2 funds.

We recommend no public access requirements for multi-unit dwellings.

We find that a minimum of four connectors is adequate.

We find the maximum of 20 chargers/40 chargers for MUDs is appropriate.

We find that 1 letter of support is adequate for the scoring rubric, however we find this letter of support inappropriate for multi-unit dwellings as asking a community entity for a letter of support for gated chargers would be disingenuous. We thus recommend that you accept a contract with the host site in lieu of the letter of support for the scoring rubric for a multi-unit dwelling.

We support a commitment from Communities in Charge to a rebate disbursement timeline, e.g. CinC provides payment within 15 days of receipt of a finalized permit.

We seek the following clarifications:

If the site is a multifamily housing project site in a Tribal community, is it eligible for both \$3,500 adders for a total of \$10,500 per charger?

Thank you for your time,

Daniel Gold, President
danny@greenwaterandpower.com