

DOCKETED

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Project Title:	CALSTART Communities In Charge EV Infrastructure Incentives
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*Comment Received From: City of San Jos , Department of Transportation
Submitted On: 10/25/2022
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City of San Jos 's Comments re CALSTART Communities In Charge EV Infrastructure Incentives

Additional submitted attachment is included below.

October 25, 2022

California Energy Commission (CEC)
715 P Street
Sacramento, CA 95814

Subject: CALSTART Communities in Charge EV Infrastructure Incentives (Docket #: 22-EVI-02)

To Whom It May Concern,

The City of San José respectfully would like to provide comments and public input on the developing Communities in Charge incentive program, led by the CEC and CALSTART, Inc.

Flexible Funding Structure to Support Local Small Businesses & Community Organizations

It is critical that staggered funding from the start and midway point of a project be made available to facilitate the participation of smaller agencies and organizations. While delayed reimbursements may be a non-issue for large public agencies and companies, it may dissuade smaller agencies, non-profits, and smaller property owners from participating in the program, as they may not have the upfront capital. Anecdotally, the City of San José has received feedback from local small businesses and community organizations that this has been a significant issue with the CALeVIP program as eligible recipients are being overlooked due to not having the required capital reserves or the capacity to upfront project costs for a long duration, especially considering Electric Vehicle (EV) chargers may not be an immediate revenue generator.

Consider additional funding for capacity analysis and electrical upgrades.

Many existing public sites that would benefit communities with L2 chargers may require additional grid capacity analysis and electric service upgrades to retrofit existing facilities and make them EV capable; or to increase EV charging capacity and install additional chargers to appropriately serve communities. The proposed program includes funding for planning and engineering design costs, but proposals without a full electric design and site plans would be placed in Tier 3 and may be delayed or not get funded if the program is oversubscribed. Considering the program may allow a maximum of 20 connectors, which would require a service increase of about 300 Amps for existing facilities, the City would like the program to consider funding service upgrades or retrofits to increase capacity and enable larger projects in existing facilities.

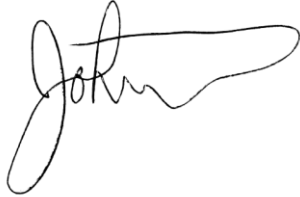
EVSE Workplace Community Connections

The City of San José fully supports the Workplace Community Connections proposal to make EVSE at workplaces eligible for funding under this program. It is worth noting that since peak energy demand typically occurs from 4 p.m. to 9 p.m. when there is less solar on the grid, daytime charging should be encouraged during the off peak hours of 9:00 am and 2:00 pm when there is excess solar and the general population is at work. A recent Stanford study projects that we would need about 5.4 gigawatts of energy storage to meet charging demand in the western United States if EV drivers continue to charge at night.¹ Workplace chargers also benefit communities that are unable to charge at home, like individuals living in multi-family housing and lower-income employees.

¹Powell, S., Cezar, G. V., Min, L. et al. [Charging infrastructure access and operation to reduce the grid impacts of deep electric vehicle adoption](#). Nat Energy (2022).

Thank you for this opportunity to provide feedback on this innovative program. For any questions regarding our comments, please do not hesitate to contact Andrea Arjona Amador with our Department of Transportation at andrea.arjonaamador@sanjoseca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "John Ristow". The signature is fluid and cursive, with a large initial "J" and a long horizontal stroke extending to the right.

John Ristow, Director
Department of Transportation