

DOCKETED

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CalETC's Comments on Joint NEVI Workshop June 29 2023

Additional submitted attachment is included below.



July 7, 2023

California Energy Commission
California Department of Transportation
Re: Docket No. 22-EVI-03

Re: Joint Workshop on Development of the 2023 Update to California's Plan for the National Electric Vehicle Infrastructure Formula Program

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the Joint Workshop on Development of the 2023 Update to California's Plan for the National Electric Vehicle Infrastructure (NEVI) Formula Program, hosted by the California Energy Commission (CEC) and California Department of Transportation (Caltrans) on June 29, 2023. CalETC would like to thank the CEC and Caltrans for all of your hard work on developing California's NEVI Program and the West Coast Truck Charging and Fueling Corridor Project.

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 supports the NEVI Program and applauds the CEC and Caltrans for their dedication to this important step in the proliferation of electric vehicle charging stations along transit corridors. California has invested significantly in zero-emission vehicles and fueling technology, and we are very excited to see the development of a robust intrastate charging network that will serve to connect Californians across the state through zero-emission transportation.

Early and frequent communication with utilities is imperative. CalETC recommends that project applicants engage their local utility as soon as they have identified candidate sites that they will be using in their NEVI Program applications. Engaging utilities early will provide the time necessary for utilities to review the power capacity at a project site as well as the complexity of any needed upgrades. 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.

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CalETC supports the CEC's and Caltrans' approach to monitor market trends before making changes to the NEVI program. Recently, the charging market has changed rapidly with the announcement that major automakers will be adopting the North American Charging Standard (NACS). Should this trend continue, it may be reasonable for the NEVI Program to adjust its minimum standards for connector types. CalETC supports the CEC and Caltrans taking an iterative process to adjusting the NEVI Program's minimum standards and we look forward to continuing to collaborate on future program solicitations.

CalETC supports funding for both light-duty and medium- and heavy-duty charging. We support continued funding for a wide array of charging solutions to enable broad access to charging across California. A number of commentors at the workshop suggested that funding for light-duty charging should be shifted towards medium- and heavy-duty charging. CalETC opposes any suggestion that there is an inherent choice between light-duty and medium- and heavy-duty charging infrastructure investments – both are necessary. The CEC's 2023-2024 Investment Plan Update for the Clean Transportation Program (Investment Plan) estimates that California has almost 80,000 Level 2 and DC Fast Chargers installed, with a goal of 250,000 by 2025. Thus, the state needs to install 170,000 chargers in under two years to meet the 2025 goal and while funding is allocated for the 170,000 additional chargers, building chargers in this short timeframe presents significant challenges. Therefore, we continue to support investing in charging infrastructure for all light-, medium-, and heavy-duty zero-emission vehicles.

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

Kind regards,



Kristian Corby, Deputy Executive Director
California Electric Transportation Coalition