

DOCKETED

Docket Number:	19-AB-2127
Project Title:	Implementation of AB 2127 Electric Vehicle Charging Infrastructure Assessments
TN #:	252343
Document Title:	EVgo Comments on AB 2127 Draft Staff Report
Description:	N/A
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Submitter Role:	Intervenor
Submission Date:	9/21/2023 5:14:19 PM
Docketed Date:	9/22/2023

September 21, 2023

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket No. 19-AB-2127 – Workshop on the Staff Draft Report of the Second AB 2127 Assessment

EVgo appreciates the opportunity to submit comments on California Energy Commission’s (CEC) Staff Draft Report of the Second AB 2127 Assessment (Draft Report). EVgo is a leader in charging solutions, building and operating the infrastructure and tools needed to expedite the mass adoption of electric vehicles (EVs) for individual drivers, rideshare and commercial fleets, and businesses. Since its founding in 2010, EVgo has led the way to a cleaner transportation future and its network has been powered by 100% renewable energy since 2019 through the purchase of renewable energy certificates. As one of the nation’s largest public fast charging networks with over 600,000 customer accounts, EVgo’s owned and operated charging network includes over 900 fast charging locations in over 60 metropolitan areas in over 30 states.

EVgo commends the CEC for its leadership in drafting an updated assessment of California’s EV charging infrastructure needs. A widespread, reliable, and convenient network of EV chargers is foundational for achieving the state’s transportation electrification goals, and the Draft Report provides an actionable evaluation of future infrastructure demand. EVgo’s comments center on the scenario modeling, charger reliability and the EV charging experience, vehicle-grid integration (VGI), and interoperability topics included in the Draft Report.

Scenario Modeling

EVgo appreciates that the CEC has updated its EV charging infrastructure demand forecasts to reflect recent regulations, including Advanced Clean Cars II, and updated EV battery capabilities. In addition, EVgo welcomes the CEC’s analysis of alternate EV charging scenarios that respond to different consumer behaviors and preferences, including the Gas Station Model.

Ultimately, California needs a portfolio of EV charging solutions to drive EV adoption and meet drivers’ evolving needs and achieve state goals. CEC modeling plainly demonstrates that both direct current fast charging (DCFC) and Level 2 (L2) charging availability must increase significantly in the near-term to enable transportation electrification at scale. Additionally, EVgo strongly agrees with the CEC that equitable access to DCFC is critical for enabling EV adoption among drivers who do not have reliable access to home or workplace charging, and the data supports it. According to a study by the UCLA Luskin Center for Innovation, a plurality of multi-family housing (MFH) residents report using public DCFC as their primary charging method, and the majority of MFH residents reported their primary charging location is outside the home.¹ The study also found that MFH residents that used public fast chargers

¹ DeShazo and Di Filippo, *Evaluating Multi-Unit Resident Charging Behavior at Direct Current Fast Chargers* at 1, UCLA Luskin Center for Innovation, February 2021. Available at: <https://innovation.luskin.ucla.edu/wp-content/uploads/2021/03/Evaluating-Multi-Unit-Resident-Charging-Behavior-at-Direct-Charging-Behavior-at-Direct-Current-Fast-ChargersCurrent-Fast-Chargers.pdf>

charged more frequently and used more energy on average than their non-MFH counterparts.² In other words, whereas many early EV adopters could primarily rely on home L2 for their charging needs, developing an EV market inclusive of all Californians requires the deployment of convenient public charging solutions that can serve a growing percentage of EV drivers without home charging access. Similarly, as included in the Draft Report, DCFC along travel corridors are essential for EV road trips, and additional build-outs are needed in major metro areas for transportation network company (TNC) electrification, driven by the Clean Miles Standard requirements to electrify over 90% of TNC vehicle miles traveled by 2030.³

Altogether, these various EV driving use cases – coupled with the state’s ambitious goals for vehicle sales – will require a focus on larger footprint, higher-capacity charging hubs. As the CEC continues to explore the Gas Station model, it should work with stakeholders to better understand ideal stall counts to meet the demand for these various use cases and local governments will be necessary to ensure that local zoning codes, which govern where EV charging infrastructure can be developed, broadly accommodate larger stall stations where EV charging is the primary use of a property.⁴

Last, EVgo appreciates that the Draft Report includes breakouts of DCFC demand by nameplate capacity and recognizes the importance of 350kW equipment in meeting California’s DCFC needs. EVgo continues to focus on deploying high power, 350kW equipment to meet evolving vehicle capabilities and expectations for charging speeds from automakers and EV drivers alike.

Charger Reliability and the EV Charging Experience

EVgo appreciates the discussion of charger reliability and the EV charging experience in the Draft Report. Increasing consumer confidence in EVs greatly depends on the convenience and accessibility of reliable charging stations. EVgo looks forward to engaging in the upcoming rulemaking as the CEC implements AB 2061 (Ting) and encourages the CEC to examine other ways it can complement the federal government’s ChargeX Consortium by leveraging Clean Transportation Program resources to address the root cause of failed charging sessions. Concepts such as Charge Yard and the Vehicle Interoperability Testing Symposium (VOLTS) are two such examples of California leading in this regard.

VGI

EVgo appreciates the CEC’s focus on VGI and the important grid benefits that EVs can provide. EVgo encourages the CEC to consider VGI in the context of diverse charging use cases and consider targeting VGI efforts on use cases that can deliver the greatest charging flexibility, including home or workplace L2 charging.

² *Id.*

³ <https://ww2.arb.ca.gov/resources/fact-sheets/clean-miles-standard-regulation-passengers-and-communities-benefit-lower>

⁴ For example, the City of San Diego has clarified that EV charging is a separately regulated use (see Section 141.0419) in its zoning code and is permitted in all base zoning districts. <https://www.sandiego.gov/city-clerk/officialdocs/municipal-code/chapter-13>

Interoperability

EVgo appreciates the CEC's focus on vehicle-charger interoperability in the Draft Report. Vehicle interoperability is key for successful charging sessions. EVgo encourages the CEC to explore funding opportunities to expand vehicle interoperability testing and help scale in a manner commensurate with the industry. In May, EVgo submitted comments in support of CEC's Charge Yard concept as a vehicle for enhancing the charging experience.⁵

Conclusion

EVgo appreciates the CEC's undertaking of this important analysis to assess future EV charging needs and looks forward to being a resource to the CEC as it continues to support transportation electrification access to all Californians.

Respectfully submitted this 21st Day of September,

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⁵ <https://efiling.energy.ca.gov/GetDocument.aspx?tn=250348&DocumentContentId=85084>