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EVgo Comments on Clean Transportation Program Investment Plan Update

Additional submitted attachment is included below.



November 29, 2023

California Energy Commission 715 P Street Sacramento, CA 95814

Re: Docket No. 23-ALT-01 – Comments In Response to Draft Staff Report of the 2023-24 Investment Plan Update for the Clean Transportation Program

EVgo appreciates the opportunity to submit comments on California Energy Commission's (CEC) Staff Draft Report of the 2023-24 Investment Plan Update for the Clean Transportation Program (Plan Update). EVgo is one of the nation's largest public fast charging providers, with over 950 fast charging locations across more than 35 states, including stations built through EVgo eXtend[™], its white label service offering.

EVgo commends the CEC for its leadership in developing the Plan Update. A widespread, reliable, and convenient network of EV chargers is foundational for achieving the California's ZEV goals, and the Plan Update appropriately places a strong focus on electrification investments to accelerate state progress. The recent passage of AB 126 will also ensure that the CEC has long-term, stable funding available to support the continued implementation of successful programs such as CALeVIP.

Moreover, EVgo appreciates the Plan Update's continued focus on supporting charging investments across all vehicle classes. Notably, sustained, long-term funding for light duty charging is critically important if California is to remain on track to meet an all zero-emission future beginning in 2035. Ultimately, California needs a portfolio of EV charging solutions to drive rapid EV adoption and meet drivers' and fleets' evolving needs – including for drivers without dedicated access to residential charging. CEC's AB 2127 state EV charger demand assessment plainly demonstrates¹ CEC's balanced approach to EV charging investments helps ensure that sufficient levels of infrastructure are deployed ahead of EV demand.

¹ Alexander, Matt, Noel Crisostomo, Wendell Krell, Jeffrey Lu, and Raja Ramesh. July 2021. Assembly Bill 2127 Electric Vehicle Charging Infrastructure Assessment: Analyzing Charging Needs to Support Zero-Emission Vehicles in 2030 — Commission Report. California Energy Commission. Publication Number: CEC-600-2021-001-CMR. Available at <u>https://www.energy.ca.gov/programs-and-topics/programs/electric-vehicle-charginginfrastructureassessment-ab-2127</u>.

Category	Level 2 Chargers	DC Fast Chargers	Total Chargers	Hydrogen Fueling Stations
Existing Chargers/Open Retail Hydrogen Fueling Stations (Estimated)*	82,135	9,808	91,943	66
Number of Chargers/Fueling Stations for Which Funding Has Been Allocated (includes anticipated funding from Clean Transportation Program)†	161,870	10,637	172,507	64
Total	244,005	20,445	264,450	130**
2025 Goal (Executive Order B-48-18)	240,000††	10,000††	250,000	200
Gap From Near-Term Goal	0	0	0	70
Inaugural Assembly Bill 2127 Report 2030 Estimate of Charging Needs	1,126,855	37,461	1,164,316	-
Gap From 2030 Estimates	882,850	17,016	899,866	-

Table ES-1: Progress Toward 250,000 Chargers and 200 Hydrogen Stations and
Beyond

Again, EVgo appreciates the CEC's undertaking of this important Plan Update and roadmap for guiding future charging infrastructure investments to benefit all Californians. EVgo looks forward to continued partnership with the CEC in accelerating the deployment of a widespread, convenient, reliable, and affordable charging network to support widespread transportation electrification.

Respectfully submitted this 29th Day of November,

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