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Feedback regarding 222 and 6222

2.2.2 c) All Level 2 EVSEs must be shared and may not be assigned or otherwise allocated to any one individual.

This type of language will leave out a majority of smaller complexes from EV charging infrastructure. In Berkeley California, I live in a 4 bedroom apartment complex with 4 parking spots. The parking spots here are assigned, which means that there would be no potential way for this small complex to take advantage of incentives to upgrade their infrastructure. I think that if there are no public parking spots in a complex (which is definitely very common with smaller complexes, there should be an option to opt into the subsidy, even if it's only at 50% or by some smaller margin, or there will not be a way to retrofit these complexes without tremendous cost.

6.2.2. Level 2 EVSE Usage Data Collection

This means that there would not be any "free" EVSEs that could be used by employees, which is the best case scenario. Installing "dumb" EVSEs are less likely to break and would be more cost effective for both the employee and employer in most scenarios. This would mean that initiatives like "Adopt a charger" will not be able to take advantage of incentives. This data collection clause should be circumvented for un-metered or "free" chargers.

We need to be encouraging all potential options for charging rather than limiting potential innovations. Charging is heavily cost weighted in the infrastructure deployment side, so any limitations imposed here will shape the technology that can be deployed more effectively. We should be focusing on wiring or creating as many EV ready spaces as possible without deploying constraints on the charging system itself. Charging systems can be subsidized if need be, but the wiring requirements for funding should be agnostic of the system itself.

Currently only early adopters are utilizing EV charging incentives. This I believe is in part due to the improper split in incentive alignment. I am currently working on deploying EV charging in an internet style deployment, which allows for property owners to deploy the infrastructure, then lets renters lease the hardware. My company, through modular design and local workers, will own the maintenance, which has proven itself to be a problem for charging infrastructure as a whole. This system is more in line with what property owners care about (zero reoccurring costs, zero maintenance costs, zero hardware costs -- ie consistent revenue and consistent expenses and an increase to property value) and more in line with what the people want (maintenance consistently monitored and taken care of, more affordable charging, more convenient charging).

One of the problems however is infrastructure incentives. While I'm working on deploying with this technique, although I would require fewer resources and fewer costs to cover through only installing the electrical backbone of the system with incentives, it would not be covered under current incentives. Paradoxically, this would make my system more expensive than our competitors who require more government incentives to unlock the same EV charging capabilities.

In order to facilitate the adoption of as many EVs as possible, particularly in multi-family homes, it would be best to try and minimize language like this (as well as requirements for J-1772 or any particular EVSE) when we really just need three things. Infrastructure (wiring, subpanels), metering, and access control. If we focus on these three things in our language, it will leave a lot more room for cost saving innovation that will benefit all parties involved.