

**DOCKETED**

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*Comment Received From: Electric Transportation Community Development Corporation  
Submitted On: 4/4/2024  
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**ETcommunity comments Community Charging in Urban Areas**

*Additional submitted attachment is included below.*



April 4, 2024

California Energy Commission

Re: Docket No. 20-TRAN-04

*Submitted via electronic commenting system for docket 20-TRAN-04*

**Re: Comments on Pre-Solicitation Workshop: Community Charging in Urban Areas**

The Electric Transportation Community Development Corporation (ETcommunity) appreciates the opportunity to provide comments on the Community Charging in Urban Areas workshop. ETcommunity is a 501(c)(3) non-profit organization that promotes an equitable transition to electric mobility options through outreach and education, collaboration building, and action in communities. ETcommunity is focused on providing equitable access to EV charging to community residents, including Level 2 and affordable DCFC options, and zero-emission mobility options, including accessible electric vans, e-scooters, e-bikes, and shared electric cars.

ETcommunity supports the CEC's efforts to provide access to equitable charging infrastructure options in urban communities. Thus far, many of the equity investments in urban communities have gone towards projects that provide DCFC infrastructure for use primarily or exclusively by those passing through the community but not EV drivers or potential EV drivers who live in the community. There are community benefits to corridor chargers (those located in priority communities near urban corridors), and the investments in these corridor chargers benefit communities. However, corridor DCFC chargers do not provide equitable access to EVs or EV charging for the people living in the community who have no access to home charging. DCFC is too expensive and/or too inconvenient to be equitably accessible to community members who have no access to home charging.

With respect, we provide the following comments on the community charging in urban areas workshop presentation.

- We support a portion or all this funding going towards projects that provide equitable access to community residents without access to home charging. Rather than focusing on DCFC corridor charging or charging that is accessible to people who do not live in the community, we believe more work is needed to assist community residents and businesses in accessing the benefits of electric mobility options. This work is time consuming as outreach and education and infrastructure upgrades needed in priority communities exceed those needed in more affluent communities. There is a low degree of trust in many priority communities, particularly around any economic benefits that may accrue to community members. Without equitable access to charging infrastructure for all community members, these communities will be "left behind" in the transition to electrification.

- We recommend CEC consider up-front grants, rather than reimbursement grants, for non-profit community-based organizations. These organizations tend to be closest to the community and do not have disposable resources adequate to risk investment in EV charging infrastructure.
- We recommend the CEC set a port minimum for each application that reflects the communities the CEC prioritizes. These investments are prioritized based on least access to equitable charging infrastructure. A lack of access to equitable charging infrastructure likely means there are few residents in the community who own or drive EVs. The number of charging ports initially installed in these communities will reflect a conservative number of users. A minimum port requirement suggests the CEC is looking for larger installations, however larger installations may not initially be practical in the communities prioritized by the CEC. If the CEC needs to set a port minimum, then that minimum should be set as low as possible to be as equitable and inclusive as possible.
- We recommend the CEC consider access to public charging available to community residents, particularly those without access to home charging, in determining whether a particular community has access to public charging. Per the discussion above, much of the public charging available in priority communities is not equitably accessible to community members. Charging infrastructure currently publicly available in many low-income communities is substantially more expensive than home or near-home charging at a Level2 port would be. This is true for both networked Level 2 and, more significantly, for publicly accessible DCFC. We ask the CEC to carefully consider whether publicly available charging in any given community is equitably accessible to EV drivers or potential drivers living in the community. If the public charging is primarily used and/or intended to support those passing by the community in need of a charge or if it is more costly for EV drivers in the community than home charging would be, then such charging ports should not be considered as “located in disadvantaged communities” for the purpose of this application. A portion of this funding could also be dedicated to supporting equitable access to charging infrastructure for EV drivers or potential drivers who live in the identified priority community.
- We support locating chargers in places where the community gathers as suggested by the CEC presentation. Community centers, libraries, schools, public places, and faith-based locations are all attractive community gathering places. However, these types of locations in these communities typically have substantive need of infrastructure improvements and do not have resources to provide an up-front loan for the cost of EV charging infrastructure, nor do they have the capital to take out a loan for an investment with this level of risk. It is imperative that the state demonstrate its willingness to invest in these communities and assume the risks associated with new infrastructure investment and support the communities’ efforts to operate and maintain the infrastructure.
- How many hours a site can be made publicly available will vary by site. For example, at a school, community center and/or Church, there may be times when security or other reasons prevent the general public from accessing charging infrastructure. Rather than specify a set amount of hours for general public access, the CEC should consider how accessible the charging infrastructure is to the community. Even if the charging infrastructure is only available for a limited number of hours,

if the site has worked with the community to determine need and continues to track need, then the CEC should consider allowing this site to receive funding. E.g., a school or church may have hours where it is essential that only those associated with the school or church enter the premises. If the applicant can demonstrate a desire and willingness to provide public charging services for community members without access to home charging and has some plan to ensure access for those who need it in the community, then CEC should consider allowing for this funding and work with the applicant to maximize access to charging infrastructure for community residents.

- The amount of funding suggested for DCFC is too low. ETcommunity supports Level 2 charging infrastructure as an equitable option and supports the \$12,500 suggested reimbursement. For instances in communities where DCFC is the most equitable solution for community residents without access to home charging, not only will the cost of the DCFC charger need to be reimbursed, but some program to allow residents affordable access to DCFC will likely be needed. The \$100K suggested will not cover the cost of installation of a DCFC nor will cover any additional site work needed, grid upgrades, or program to assist low-income residents without access to home charging. We do believe that there are sites where both DCFC and Level 2 charging is attractive, but the funding for DCFC currently suggested would not make DCFC installations feasible. We suggest the CEC conduct a careful review of infrastructure costs over the next few months as they put together the final solicitation.
- We support removing a match requirement for non-profit organizations.
- We support efforts to train and employ community residents to support electrification of mobility options. Although it is difficult to locate a trained workforce in many priority communities, ETcommunity works with the Los Angeles Cleantech Incubator and other organizations to help train low-income California residents to support to growing EV industry. We support efforts to provide credit or recognize the need to train a local workforce as one component of this program selection process for the Urban Charging grant.

Thank you for your consideration of our comments. Please do not hesitate to contact me [eileen@etcommunity.org](mailto:eileen@etcommunity.org) should you have any questions.

Sincerely,



Eileen Wenger Tutt, Executive Director  
Electric Transportation Community Development Corporation