

**DOCKETED**

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## **CaIETC's Comments on the Joint Workshop for the EVC RAA Program**

*Additional submitted attachment is included below.*



April 15, 2024

California Energy Commission  
Re: Docket No. 23-EVI-01

*Submitted via electronic commenting system for docket 23-EVI-01:*  
<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=23-EVI-01>

### **Re: CalETC's Comments on CEC-Caltrans Joint Workshop on EVC RAA Program**

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the California Energy Commission (CEC) and Caltrans (collectively "Agencies") joint workshop on California's Electric Vehicle Charger Reliability and Accessibility Accelerator (EVC RAA) Program Concepts held on March 27, 2024. CalETC greatly appreciates Staff's work on the EVC RAA Program as reliable charging is vital to the growth of the EV market and meeting the state's climate and air pollution goals.

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, and other industry leaders supporting transportation electrification.

CalETC supports the Agencies' proposed EVC RAA Program and believes it is vital to repair or replace older chargers with the next generation of chargers. While EVs have undoubtedly entered the mainstream by reaching 25% of the cars sold in California in 2023, the vehicles and the charging infrastructure that supports them are relatively new and have seen a significant increase in usage over the last ten years. Repairing and replacing chargers is a key strategy to update existing infrastructure and reinforce the durability of the existing charging network. CalETC also supports the expedited nature of the EVC RAA program, and we make the following recommendations in the spirit of improving an already stellar concept.

CalETC recommends increasing the amount of reimbursement to 80%. While this is higher than the reimbursement amount for CALeVIP, we believe the requirements of this program justify an increased reimbursement. The ports that can be repaired or replaced are limited to the listed ports, which limits applicants' options for project proposals. The overlay of the NEVI requirements will make sites within 1 mile of a designated Alternative Fuel Corridor more expensive to repair or replace if the site needs to be upgraded to meet NEVI standards. Additionally, the short timeline

for completing these projects, just 12 months, will require additional capital to manage and complete on an expedited schedule. Therefore, we recommend increasing the percentage of the costs that can be reimbursed.

CalETC recommends not requiring a preliminary site design from the utility for replacement projects, and if necessary, only requiring a conceptual site design from the applicant. Preliminary site designs can be expensive and time-consuming, which does not fit with the expedited nature of these projects. A conceptual site design can provide a reasonable amount of information about the project's design and feasibility that will give the Agencies enough information to rank and select projects. Alternatively, the CEC could require a preliminary design when it is relevant for the project, i.e., when additional electrical service is requested. Automated load management could also be employed at sites that are adding chargers to avoid the need to increase the electrical service at the site.

Finally, CalETC recommends not using historical utilization data as a criterion for evaluating applications. Historical utilization data will be a poor indicator of performance for chargers that have been non-operational. Instead, we recommend focusing on project readiness, including permits, site control, and environmental impacts.

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

Sincerely,



Kristian Corby, Deputy Executive Director  
California Electric Transportation Coalition