

DOCKETED

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EVCA - EVC RAA Program Comments

Additional submitted attachment is included below.



April 15, 2024

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket No. 23-EVI-01 -- Comments on Joint Workshop for California's Electric Vehicle Charger Reliability and Accessibility Accelerator

On behalf of the Electric Vehicle Charging Association (EVCA), we appreciate the opportunity to provide comments as California Energy Commission (CEC) and Caltrans finalize implementation plans for California's Electric Vehicle Charger Reliability and Accessibility Accelerator (EVC RAA) program. EVCA is a not-for-profit trade organization of 23 leading EV charging industry member companies. The association was established in 2015 to comprehensively represent the entire EV charging value chain and provide a collective industry voice for decision makers. EVCA recognizes the critical role this initiative will play in accelerating transportation electrification across the state to meet climate, air quality, and equity goals.

We commend the CEC and Caltrans for their leadership in upgrading California's charging network through EVC RAA. As the agencies prepare program requirements, EVCA encourages careful consideration of the following program design issues:

Funding Share: EVCA appreciates CEC's and Caltrans' intent to support more charging station replacements by reducing the amount of eligible incentive funding per project to 50%. Guidance from the Federal Highway Administration (FHWA) allows up to 80% of eligible project costs to be covered by EVC RAA, and the agencies communicated these specifications during an October 2023 workshop. Maintaining this higher cap and evaluating applications with competitive cost-effectiveness metrics will allow applicants to request the amount needed to complete project upgrades while enhancing the competitive nature of the program by encouraging applicants to request less funding. EV charging providers made

efforts to carefully identify the most suitable projects for EVC RAA with the information shared by FHWA and the joint agencies; reducing the available incentive level per project could inadvertently reduce the pool of feasible EV charger replacement projects and limit the effectiveness of the program.

Application Requirements: EVCA encourages CEC and Caltrans to require a utility verification form and preliminary utility assessment in lieu of a preliminary site design in the EVC RAA application process. Detailed site designs and engineering represent a major upfront cost, often reaching tens of thousands of dollars per site for applicants. Moreover, while these costs are reimbursable expenses under other key CEC solicitations like the National Electric Vehicle Infrastructure (NEVI) program and CALeVIP 2.0, the agencies shared during their October 2023 workshop that project costs incurred before the award date would not be considered reimbursable. Requiring only utility verification forms and an initial utility assessment should provide sufficient detail to evaluate project feasibility while allowing selected awardees to complete full engineering design and permitting processes supported by program funds post-award.

Project Evaluation: EVCA also encourages CEC and Caltrans to focus on assessing a project's ability to meet an unmet charging need and on project readiness in the application review process rather than evaluating historical utilization data as proposed in the March workshop. With EV markets evolving and growing rapidly, solely relying on historical utilization data risks prioritizing projects misaligned with future charging needs and travel patterns as EV adoption scales. Emphasizing criteria such as the project's ability to provide EV charging access to those without home charging, a project's proximity to amenities, and project viability and demonstrated ability to meet FHWA-established timelines offers a more holistic view to identify awardees best positioned to enhance charging reliability and accessibility long-term.

Public Entities: EVCA encourages the CEC to accept applications from public entities. While we appreciate the CEC's intention to limit the scope of this grant opportunity to private entities to simplify application review, public entities are responsible for operating many public chargers across California and demonstrate a strong desire to improve the driver experience. Broadening application eligibility is allowed by federal rules, aligns with the spirit of EVC RAA, and will invite quality applications that would otherwise be ineligible.

EVC RAA represents a vital opportunity to strategically upgrade California's charging network in the near-term and inspire consumer confidence in EVs through an enhanced charging experience. EVCA remains ready to support the swift finalization of EVC RAA and accelerate progress on California's transportation electrification goals.

Sincerely,

Reed Addis

Government Affairs

Electric Vehicle Charging Association