

**DOCKETED**

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## **EVgo Comments on 2025-2026 CTP Investment Plan Update**

*Additional submitted attachment is included below.*

May 15, 2025

California Energy Commission  
715 P Street  
Sacramento, CA 95814

**Re: Docket No. 25-ALT-01 – Public Meeting of the Advisory Committee for the Clean Transportation Program Investment Plan**

**Introduction**

EVgo appreciates the opportunity to submit comments on the April 30<sup>th</sup> workshop on the Clean Transportation Program (CTP) Investment Plan. As one of the nation's largest public fast charging providers, EVgo shares the CEC's vision for an elevated customer experience for electric vehicle (EV) drivers and recognizes that a reliable, widespread EV charging network is crucial for scaling EV adoption needed to help achieve California's equity, clean energy, decarbonization, and air quality goals.

The CTP Investment Plan provides an important roadmap for the execution of California's policy goals, and EVgo commends the CEC's leadership in accelerating EV adoption through a diverse portfolio of EV charging programs. To ensure that the CTP Investment Plan positions California for success and accurately reflects market conditions, EVgo makes the following recommendations:

1. Establish durable, predictable, and transparent funding cycles that meet CEC-funded charger deployment targets and will lead to more market certainty and consistent EV charger deployment; and
2. Maintain an emphasis on fast charger deployment to equitably accelerate progress on transportation electrification goals.

- 1. Establish durable, predictable, and transparent funding cycles that meet CEC-funded charger deployment targets and will lead to more market certainty and consistent EV charger deployment**

EVgo commends the CEC for its commitment to multiyear funding plans that establish greater certainty for market participants in its proposed Guiding Principles. A simple, predictable, and durable cycle of future solicitations for the CEC's EV charging funding initiatives – especially

block grants – would support more efficient capital planning and submission of high-quality projects that meet CEC’s specifications as well as state infrastructure needs through 2030. Moreover, transparent scheduling creates more market certainty that will lead to more consistent deployments of charging infrastructure as envisioned in 2025-2030 EV charging infrastructure forecasts in the 2024 Zero-Emission Vehicle Infrastructure Plan – even if budgets fluctuate year over year.<sup>1</sup>

Other best in class state infrastructure programs provide this certainty, and California should follow the lead of these other states. For example, Colorado Energy Office’s *Charge Ahead Colorado* EV charging grant program provides three standard application funding rounds annually in January, May, and September.<sup>2</sup> Similar program cycles are and will continue to be a necessary component of CEC’s overarching strategy to support California’s nation-leading EV charger deployment goals.

## **2. Maintain an emphasis on fast charger deployment to equitably accelerate progress on transportation electrification goals.**

EVgo supports the CEC’s emphasis on fast charger deployments as an efficient, effective strategy for accelerating transportation electrification in its proposed Guiding Principles for the CTP Investment Plan. As noted in CEC’s Electric Vehicle Charging Infrastructure Assessment<sup>3</sup>, direct current fast charging (DCFC) infrastructure remains a critical component of California’s efforts to support EVs and serve a variety of use cases, including:

- *EV charging access for multi-family housing (MFH) residents:* DCFC infrastructure is critical for enhancing equity and accessibility for MFH residents that drive EVs. According to a study by the UCLA Luskin Center for Innovation, a plurality of MFH residents report using public DCFC as their primary charging method, and the majority of MFH residents reported their primary charging location is outside the home.<sup>4</sup> The

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<sup>1</sup> <https://www.energy.ca.gov/sites/default/files/2025-01/CEC-600-2025-002.pdf>

<sup>2</sup> <https://energyoffice.colorado.gov/charge-ahead-colorado>

<sup>3</sup> See Davis, Adam, Tiffany Hoang,

Thanh Lopez, Jeffrey Lu, Taylor Nguyen, Bob Noltz, Larry Rillera, Dustin Schell, Micah Wofford. 2023. *Assembly Bill 2127 Second Electric Vehicle Charging Infrastructure Assessment: Assessing Charging Needs to Support Zero-Emission Vehicles in 2030 and 2035*. California Energy Commission. Publication Number: CEC600-2024-003-CMR <https://www.energy.ca.gov/publications/2024/assembly-bill-2127-second-electric-vehicle-charging-infrastructure-assessment>

<sup>4</sup> DeShazo and Di Filippo, Evaluating Multi-Unit Resident Charging Behavior at Direct Current Fast Chargers at 1, UCLA Luskin Center for Innovation, February 2021. Available at: <https://innovation.luskin.ucla.edu/wp-content/uploads/2021/03/Evaluating-Multi-Unit-Resident-Charging-Behavior-at-Direct-Charging-Behavior-at-Direct-Current-Fast-ChargersCurrent-Fast-Chargers.pdf>

study also found that MFH residents that used public fast chargers charged more frequently and used more energy on average than their non-MFH counterparts.<sup>5</sup> In other words, whereas many early EV adopters could primarily rely on home charging for their charging needs, developing an EV market inclusive of all Californians requires the deployment of convenient public charging solutions that can equitably serve a growing percentage of EV drivers without dedicated home charging access.

- *Electrification of ride-hailing services:* Convenient public fast charging is critical for the electrification of high-mileage ride-hailing fleets, particularly in urban metro areas. CARB's Clean Miles Standard requires platforms like Uber and Lyft to achieve fully zero-emission rides by 2030.<sup>6</sup>
- *Intercity travel:* DCFC plays an instrumental role in supporting intercity EV travel along highway corridors and fostering greater consumer confidence in EVs.

Continuing to support investments in fast chargers through large-scale, efficient solicitations like CALeVIP will enable the CEC to expand access to EV charging in all communities across the state.

## **Conclusion**

EVgo thanks the CEC for initiating the CTP Investment Plan update and recognizes that the level of ambition in California's transportation electrification goals requires efficient, innovative approaches to achieving a widespread and convenient EV charging network. By providing greater transparency around funding cycles and supporting fast charger deployments, CEC can enable the state to achieve these goals. EVgo looks forward to being a resource as the CEC executes the CTP Investment Plan.

Respectfully submitted this 15<sup>th</sup> day of May, 2025,

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<sup>5</sup> *Id.*

<sup>6</sup> See <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2021/cleanmilesstandard/fro.pdf>