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Comments on the CEC workshops on August 4 and 6, 2020 on Charging Infrastructure Topics

CalETC Comments on the CEC workshops on August 4 and 6, 2020 on Charging Infrastructure Topics.

Additional submitted attachment is included below.

CalETC
California Electric Transportation Coalition

August 27, 2020

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 20-IEPR-02
1516 Ninth Street
Sacramento, California 95814-5512

Submitted to on-line portal: https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=20-IEPR-02

Re: Comments on the CEC workshops on August 4 and 6, 2020 on Charging Infrastructure Topics

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide feedback on the CEC workshops on August 4 and 6, 2020 on charging infrastructure and related topics. We appreciate the time and effort it took to organize these workshops and the new information that was provided.

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 also includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, and other industry leaders supporting transportation electrification.

We laud the CEC for presenting new outreach information to underserved communities related to charging stations, charging infrastructure technology and markets, modeling and projecting charging infrastructure and examining needs for charging infrastructure development. We recognize that California is well behind in meeting the charging infrastructure needs for electric cars, trucks, and buses today, and is getting further behind by the day. Our CalETC Infrastructure Needs Assessment for 5 million light-duty electric vehicles (EVs), as well as assessments done by CEC and CARB, indicate the pressing need for accelerated build out of EV charging infrastructure.

CalETC recommends the state agencies consider how their policies and investments can be implemented to keep EV charging costs low, especially in disadvantaged and low-income communities. Non-networked lower-kW charging infrastructure[1] can be attractive low-cost options for those without access to at-home charging, living in multi-unit dwellings, charging at long-dwell-

[1] Non-networked lower-kW charging infrastructure includes Level 1 charging infrastructure that is permanently affixed, not merely a 120V wall plug, lower-kW Level 2 and lower-kW DCFC charging infrastructure

time locations, and/or for entities preferring lower-cost self-managed charging options[2]. Non-networked lower-kW charging infrastructure can be designed to be grid-friendly and achieve low-cost VGI through adherence to time-variant rates (including time-of-use rates). CalETC believes there are also attractive networked L2 and DCFC options (e.g., customers may want the benefit of fuel cost savings through networked charging[3] options or the grid benefits associated with networked charging infrastructure). We recommend policy makers prioritize customer preferences, weighing costs, convenience, affordability, and accessibility, while also considering grid impacts for VGI solutions across the multiple charging infrastructure options.[4]

Existing time-variant rate programs have demonstrated that, particularly for long dwell-time locations (e.g. workplace and residential, including MUD charging), customers respond to price signals and shift load to less-costly grid-beneficial times, with and without networked charging infrastructure. Similarly, customers respond to price signals and lower-cost and/or lower-kW products. CalETC recommends policy makers consider the value proposition of all types of charging infrastructure—not all charging infrastructure benefits from networking. Requiring networked charging infrastructure to receive public incentive dollars, as is currently the case, is needlessly limiting, restrictive and likely to increase costs.

The July 17 letter on the 20-IEPR-02 docket from CalETC, Adopt A Charger, Electric Auto Association, Ford Motor Company, Kitu Systems, Natural Resources Defense Council, Nissan North America, Orange Charger, Plug-in America and Toyota provides additional detail on the need for more lower cost charging solutions, the need for a technology neutral approach (per SB 676 (Bradford, 2019) to different types of network charging and the role of public funding for both charging infrastructure and VGI.

Regarding the presentation on Transportation Electrification Regulatory Policies Act (TERPA), we have participated in follow-up meetings with CEC staff and CalETC member VGI experts on the TERPA concept. We do not yet understand the TERPA approach and are concerned that the fact of its complexity creates a barrier to affordable and accessible charging infrastructure and electricity fuel for all. While CalETC applauds CEC's creativity, we believe that near-term focus should be on making necessary program reforms to CALeVIP to ensure a higher execution and success rate for each of its projects.[5] Potential reforms may include consideration of new technological improvements (e.g.,

[2] The VGIWG defined self-managed charging as indirect or passive managed charging. It includes shifting kWh through a vehicle app in response to time-variant rates, or reducing kW by purchasing lower-kW charging stations, kiosks or building energy management system to control a bank of charging stations or stations that manage charging in two to four connectors.

[3] The VGIWG defined networked charging infrastructure as direct or active charge management by charging networks, automakers, or cloud aggregators contracted by parties such as load serving entities.

[4] 2017 EPRI study available here: https://www.epri.com/#/pages/product/3002011098/, which considered electricity costs and all fees for away-from-home charging in each state and put them into a common metric so that pricing can be more easily compared.

[5] For example, the Southern California Project, launched in 2018, has only seen only about 40% of funds issued in nearly two years despite a 12-month deadline for energization for all new projects.

higher power DCFC, power sharing), queue management challenges, and addressing implications of applicant caps for DCFC, where the owner-operator model is prevalent.

Thank you for considerations of our comments

Regards

Eileen Wenger Tutt, Executive Director