



March 30, 2020

California Energy Commission
RE: Docket Number 19-ALT-01
1516 Ninth Street
Sacramento, CA 95814

Re: 2020-2023 Investment Plan Update for the Clean Transportation Program

Dear Patrick Brecht and California Energy Commission staff,

Consumer Reports¹ supports the aims and goals outlined in this ambitious document. The Commission staff deserve praise for drafting a comprehensive and digestible plan that addresses competing priorities.

Below is a summary of our positions regarding light-duty charging infrastructure:

1. Three year funding plan: We support the approach of a three year funding plan. This structure provides certainty to stakeholders regarding funding decisions while sending a clear market signal to businesses, such as those providing Electric Vehicle (EV) charging infrastructure.
2. Front-Loading: We generally support front-loading light-duty charging infrastructure investments. As staff reported, widespread adoption of Zero Emission Vehicles (ZEVs) depends on refueling infrastructure that meets consumers' needs and expectations.² Aggressive funding measures for Electric Vehicle charging stations (EVCS) will help ensure that access to charging is not a barrier EV adoption. That said, we recommend a more gradual decrease in funding for light duty infrastructure after 2021 paired with a more gradual increase in Medium and Heavy duty infrastructure funding starting in 2020-2021.

¹ Consumer Reports is an independent, nonprofit membership organization that works side by side with consumers to create a fairer, safer, and healthier world. For 80 years, CR has provided evidence-based product testing and ratings, rigorous research, hard-hitting investigative journalism, public education, and steadfast policy action on behalf of consumers' interests. CR has exposed landmark public health and safety issues and strives to be a catalyst for pro-consumer changes in the marketplace. From championing responsible auto safety standards, to winning food and water protections, to enhancing healthcare quality, to fighting back against predatory lenders in the financial markets, Consumer Reports has always been on the front lines, raising the voices of consumers.

² California Energy Commission, Draft Staff Report, 2020-2023 Investment Plan Update for the Clean Transportation Program, [March 2020](#)

3. Consumers in Multifamily Dwellings, Part 1: We support the Investment Plans’s focus on funding charging infrastructure that targets consumers in multifamily dwellings. Only about 14 percent of privately owned ZEVs were registered to residents of multifamily dwellings.³ Lack of charging infrastructure is a key obstacle to EV adoption for this demographic.⁴ Additionally, as Commission staff noted, in cases where these residents live in low-income, disadvantaged communities or communities of color, widespread EV adoption has equity implications. Therefore it is critical to prioritize this segment of the population.
4. Consumers in Multifamily Dwellings, Part 2: We encourage staff to ensure that incentives for charging infrastructure projects are sufficiently structured to overcome the barriers that have hindered such adoption at or near multifamily dwellings.⁵ The report noted that “projects at multifamily housing have been historically underrepresented by applicants.” We further encourage staff to structure the incentives to appropriately apply to both new and existing construction given that approximately 80 percent of passenger EV charging takes place at home because of its convenience and cost-savings.⁶ Residents of multifamily dwellings deserve to have access to these benefits, either at home or at a nearby, convenient location. If staff have taken steps to address the specific barriers associated with multifamily dwellings, we request that such design parameters be shared for comment.
5. Priorities: Consumer Reports recommends prioritizing charging infrastructure deployment and equitable eMobility projects over investments in pre-commercial technologies. While we welcome some limited investment in innovative charging technologies, charging infrastructure and equity represent core needs requiring a higher priority. California is a leader in clean transportation, and limited experiments with innovative technologies could be reasonable, especially if the Commission can find programs that have access to federal cost-sharing. But limited state funds are better spent on deployment while pushing for the U.S. Department of Energy to expand its own support for such innovations, given its resources and expertise in that area.

Overall, Consumer Reports supports this proposal’s goals to increase EV charging infrastructure to will help lower the barrier to EV adoption, increasing access to clean vehicles that produce significantly less pollution⁷ and greenhouse gasses.⁸

Warm Regards,

³ California Air Resources Board. Electric Vehicle (EV) Charging Infrastructure: Multifamily Building Standards. [2018](#)

⁴ California Air Resources Board. Electric Vehicle (EV) Charging Infrastructure: Multifamily Building Standards. [2018](#)

⁵ *Ibid*

⁶ US Department of Energy, Office of Energy Efficiency and Renewable Energy, Vehicle Charging, Charging at Home, accessed [3/20/20](#)

⁷ Consumer Reports, *How Clean Are Vehicles in Your State*, [9/12/19](#)

⁸ US Department of Energy, Energy Efficiency and Renewable Energy, Alternative Fuels Data Center, Emissions from Hybrid and Plug-In Electric Vehicles, accessed 3/20/20, https://afdc.energy.gov/vehicles/electric_emissions.html

A handwritten signature in blue ink, appearing to read 'A. Artis', with a long horizontal flourish extending to the right.

Alfred J. Artis
Policy Analyst