

DOCKETED

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Comment Received From: Joel Espino

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**Comments of the Greenlining Institute: Block Grant for EV Incentive Projects -
FresYES Incentive Project Workshop**

Additional submitted attachment is included below.

October 3, 2017

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Block Grant for EV Incentive Projects - FresYES Incentive Project Workshop

I. Introduction and Background

The Greenlining Institute greatly appreciates the opportunity to submit public comment on the “FresYES Incentive Project Workshop” for the Block Grant for EV Incentive Projects, docket number 17-EVI-01.

The Greenlining Institute (“Greenlining”) is a racial and economic justice nonprofit working to advance economic opportunity and empowerment for people of color through advocacy, community and coalition building, research, and leadership development. Greenlining is committed to fighting systemic and explicit disinvestment in communities of color resulting from “redlining” practices.

According to the Block Grant (GFO-16-603) application, the Block Grant recipient (Center for Sustainable Energy), among other things, will:¹

- Identify EV charger incentive projects which may be developed based on:
 - Geographical region (cities, counties, regions, etc.).
 - Locational requirements (e.g., destination, workplace, corridors, multi-unit dwellings, *disadvantaged communities*, etc.).²
- Develop *simple and user-friendly application documents* for each EV charger incentive project.³

¹ <http://www.energy.ca.gov/contracts/transportation.html#GFO-16-603>

² Emphasis added.

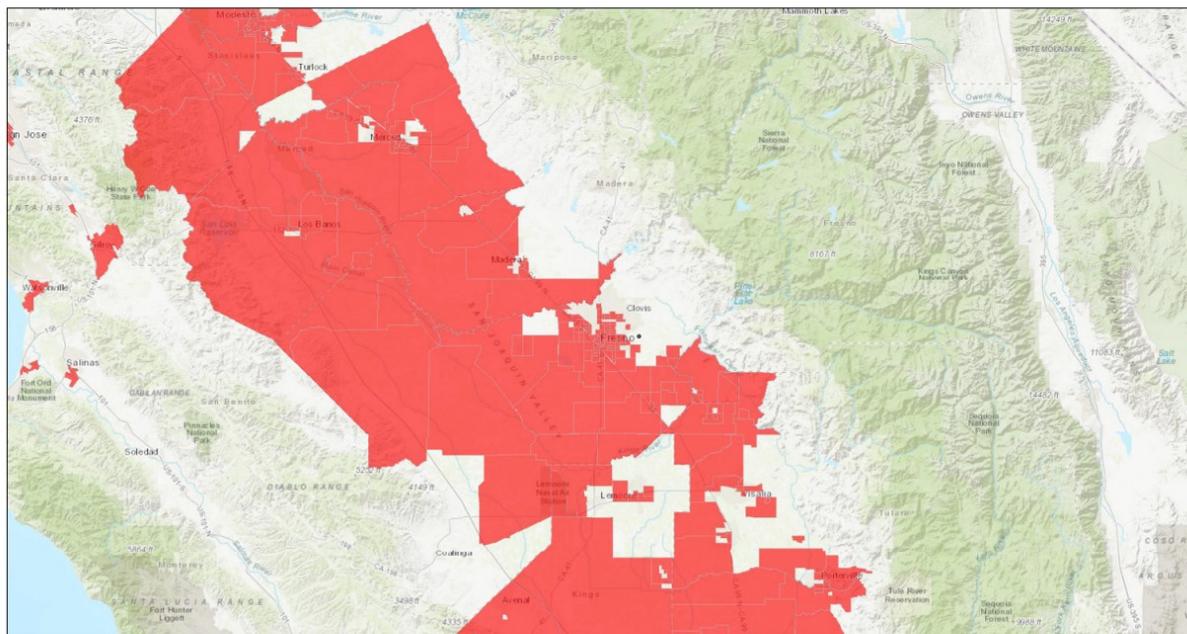
³ Emphasis added.

- Develop an outreach and advertisement plan for each approved EV charger incentive project including *appropriate outreach materials to reach targeted markets and areas*.⁴
- Conduct outreach in accordance with Commission Agreement Manager approved outreach and advertisement *plan to maximize participation by the targeted markets and areas*.⁵

II. Because of Increased EV Equity Funding in the Central Valley, the FresYES Should Include a Specific Equity Component to Maximize Impact in Low-Income and Disadvantaged Communities.

Based on the bolded text above, it is within the scope of the Block Grant to create incentive projects specific to the EV charging needs of disadvantaged communities and low-income drivers in the state of California. The FresYES program will encompass many of the disadvantaged communities Fresno County contains, under CalEnviroScreen 3.0 (see below).

SB 535 Disadvantaged Communities (2017)



October 3, 2017
 SB 535 Disadvantaged Communities
 Override 1

1:1,155,581
 0 10 20 40 mi
 0 20 40 80 km

Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeBCO, IGN, Kaiser, NLS, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS

However, as the incentive project is described, there is no guarantee that the charging station rebates will go to low- and moderate-income households (LMI). Nor is there language around targeted outreach or formal partnerships with EV equity programs like EFMP Plus-Up—

⁴ Emphasis added.
⁵ Emphasis added.

administered by Valley CAN in the Central Valley—or the statewide low-income EV financing program.

In the coming year, the Central Valley will experience an influx of EV equity funds intended to increase EV access for low- and moderate-income individuals. The Air Resources Board will award \$5M to Beneficial State Bank and Center for Sustainable Energy to create a 3 year EV financing pilot program, which will have a focus on helping low-income and working families in the Central Valley purchase plug-in hybrid electric vehicles, and pure-battery electric vehicles (award to be announced in October 2017). Moreover, the EFMP Plus-Up program in the Central Valley continues to scale up operations after receiving a funding boost of \$15M in FY 2016-17 after only receiving \$6M total for FY 2014-15 and FY 2015-16.⁶

Since launching in July of 2015 through June 30, 2017, Valley CAN has replaced 900 vehicles using \$6M of the \$21M allocated to it to date (\$15M remains unspent) with more coming in ARB's 2017-18 funding plan.⁷ About half of the vehicles scrapped have been replaced with a PHEV or BEV. Currently, Valley CAN is significantly scaling up operations to take in and process more applications. If we make projections based on Valley CAN's performance to date, we can anticipate an additional 1,125 plug-in EVs (PHEVs or BEVs) going to LMI families in the Central Valley.⁸

As a result, there will be an increasing need for EV charging solutions for LMI families in Fresno County and throughout the Central Valley.

Recommendations:

We recommend that the design of the FresYES project include specific components to increase EV access for low- and moderate-income families like the following:

- Point of sale rebates or prequalification for LMI (to eliminate the upfront cost barrier)
- Higher rebate amounts that cover the cost of the charging station but also costs associated with installation
- Case assistance, in language, in helping individuals complete applications and paperwork

We recommend that the FresYES program create a formal partnership with Valley CAN's scrap and replace program and collaborate with its partnership with PG&E to provide free electrical panel upgrades for LMI homes.⁹

Moreover, because of the increased emphasis on EV equity in ARB's Low Carbon Transportation Program, and because of the minimal investment from the investor-owned utility EV charging infrastructure pilots, we recommend that incentive projects under the Block Grant

⁶ See, https://www.arb.ca.gov/msprog/aqip/fundplan/1718_draft_funding_plan_workshop_100417.pdf

⁷ See, <https://www.arb.ca.gov/msprog/lct/project.htm>; See also, https://www.arb.ca.gov/msprog/aqip/fundplan/1718_draft_funding_plan_workshop_100417.pdf

⁸ CALCULATION: The cost effectiveness of using \$6M to replace clunkers with 450 PEVs (50% of 900 total cars replaced) is about \$13,333 per replacement. Assuming the same cost effectiveness and replacement rate of 50% being PEVs, then \$15M gets you about 1,125 PEVs.

⁹ See, https://www.pge.com/en/about/newsroom/newsdetails/index.page?title=20170919_pge_partners_with_valley_can_and_ibew_to_connect_underserved_communities_with_electric_vehicles

fill EV charging gaps and thus include equity components.¹⁰ Formalizing this effort as an initiative or pilot program aimed at facilitating transportation electrification (e.g. EV ownership, EV carsharing, electric transit buses, electric microtransit options) in disadvantaged and low-income communities and setting aside funds for this approach will help mobilize relevant state agencies stakeholders around this objective.

Lastly, Greenlining recommends leveraging ARFVTP funds to create an inclusive economic ripple effect. Specifically, we recommend that the incentive projects be designed in a way that promotes equitable job and business contracting benefits. Solicitations and contracts to administer the EV incentive projects coming out of the Block Grant should require bidders/contractors to demonstrate, where applicable:

- Hiring of low-income workers and other individuals with barriers to employment (through targeted or local hiring policies, or others);
- Diverse workforce demographics;
- Partnerships with skills development programs (or its own training programs) targeted at low-income workers and people with barriers to employment, such as job training and pre-apprenticeship programs; especially those that provide support services to participants (e.g. child care, transportation assistance, financial stability, etc.); and/or
- Paying of prevailing wages; providing benefits for hires, partners, and dependents (medical and dental coverage, paid vacation and sick leave, retirement savings, transportation reimbursement, childcare assistance, paid training opportunities); predictable scheduling; and opportunities for advancement for entry-level workers.

CSE (and its subcontractors) should use this information in scoring contracts and solicitations. A contractor that demonstrates these attributes should receive additional points. Incorporating these job and contracting recommendations will promote CEC's "Commitment to Diversity" presented at the September 28, 2017 workshop.¹¹ Integrating these recommendations will also align the CEC's efforts with agencies like the Strategic Growth Council, which is incorporating similar economic equity considerations in the implementation of its Transformative Climate Communities Program.¹²

¹⁰ See, <http://www.cpuc.ca.gov/zev/#Infrastructure>

¹¹ See, http://docketpublic.energy.ca.gov/PublicDocuments/17-EVI-01/TN221331_20170929T100810_FresYES_Incentive_Project_Workshop.pdf

¹² See, <http://sgc.ca.gov/Grant-Programs/Transformative-Climate-Communities-Program.html>

III. Conclusion

Greenlining respectfully requests that the recommendations above be strongly considered in finalizing of the FresYES incentive project and in the implementation of the Block Grant. Adopting these recommendations will leverage public funds in a more equitable and inclusive way by co-benefits complementing ARB EV equity programs aimed at increasing EV access for low-income and working families and inducing EV demand in disadvantaged communities.

Sincerely,

/s/ Joel Espino

Joel Espino
Environmental Equity Legal Counsel
The Greenlining Institute