THE GREENLINING INSTITUTE

The Greenlining Institute
360 14th Street, 2nd Floor
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December 20, 2024

California Energy Commission
715 P Street
Sacramento, CA 95814

Submitted electronically

Re: Docket 20-TRAN-02 (Senate Bill 1000 Staff Workshop)

The Greenlining Institute ("Greenlining"), works toward a future where communities of color can build wealth, live in healthy places filled with economic opportunity, and are ready to meet the challenges posed by climate change. We greatly appreciate the opportunity to submit comments to the California Energy Commission (CEC) to provide feedback on the 2024 SB1000 Assessment.

Factor In Affordability and Reliability of Public Charging

We understand the underlying premise of this workshop's model is that EVs without home charging should have their charging needs met by public Level 2 or DC fast chargers, ideally within a walking or nearby distance to home. However, in focusing on geographical proximity to a public charger as the primary measurement of accessibility, this model glosses over two critical factors: affordability and reliability of public chargers.

Public charging, particularly DC fast charging, is significantly more expensive than Level 1 home charging. This financial impact is further compounded by the fact that residents in multi-family homes, which have much lower rates of access to home charging than single-family homes, are also more likely to be lower-income. Without mitigating public charging costs for low-income and disadvantaged communities, EVs will continue to be inequitably cost-prohibitive for these households to own and operate. Potential solutions could include prepaid charge cards (as adopted in Clean Cars 4 All) or discounted public charging rates for low-income households.

Additionally, this model's success is contingent on the reliability of public chargers. We submitted comments to the CEC previously supporting NEVI-aligned 97% uptime requirements. It is important that this standard is adopted and enforced, especially if a portion of EV drivers— again, more likely to be lower-income residents of multi-family homes— will be completely relying on public charging.

In order to fill home charging gaps with public charging, affordability and reliability must be addressed, or else we risk further exacerbating inequitable access to EVs.

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Coordinate Mapping Tool Development With Existing Resources

We appreciate CEC staff's efforts to develop a public mapping tool that illustrates the need for walking distance and neighborhood charging. This is quite similar to an effort currently underway by UC Berkeley's Center for Law, Energy, and the Environment (CLEE). Their EV Equity Roadmap tool, which we provided some input on, incorporates multiple factors in order to map out priority EV infrastructure investments, including distance to a public Level 2 and DC fast charger, EV density, CalEnviroScreen percentile, multi-family housing, renter status, electric load capacity, and co-location with other points of public infrastructure. These are important equity factors that provide a fuller picture of California's EV charging needs and opportunities than proximity to a charger alone. As CEC staff continue to develop your mapping tool, we highly recommend coordinating with CLEE and other resource developers in order to streamline efforts and produce the most comprehensive tool possible.

Procedural Comments on Public Feedback Timelines

The December 23rd deadline for public comment only allows for 5 business days for comment, which is insufficient for advocates and community members alike. In contrast, however, OAL guidance, which CARB and CPUC both follow, requires 45 days for written comments on proposed regulations. While we understand that this comment period is only covering preliminary findings and modeling parameters, having too short of a timeline reduces community input. We encourage CEC to adopt OAL guidance going forward for public comment deadlines.

Conclusion

We appreciate the opportunity to comment on the CEC's 2024 SB1000 Assessment and look forward to continuing to track progress on this effort. Please do not hesitate to reach out to me (marissa.wu@greenlining.org) with any questions or to schedule time to discuss our recommendations further.

Best regards,

Marissa Wu
Transportation Equity Program Manager