



RURAL COUNTY REPRESENTATIVES  
OF CALIFORNIA

August 22, 2023

The Honorable Eduardo Garcia  
Chair, Assembly Utilities and Energy Committee  
1020 N Street, Suite 408A  
Sacramento, CA 95814

The Honorable Pilar Schiavo  
Chair, Assembly Select Committee on Electric Vehicles and Charging Infrastructure  
1021 O Street, Suite 4140  
Sacramento, CA 95814

**RE: Written Comments for 8/23 Hearing on Roadblocks to Electric Vehicle Charging Infrastructure**

Dear Assembly Members Garcia and Schiavo:

On behalf of the Rural County Representatives of California (RCRC), we appreciate the opportunity to provide written comments for your “Charging Forward: Identifying Roadblocks to Electric Vehicle Infrastructure Deployment Across California” informational hearing. RCRC is an association of forty rural California counties and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties.

RCRC member counties have unique landscapes, communities and workforce needs that greatly differ from those found in many urban and suburban areas. Rural residents often commute longer distances to work—or drive all day for work—than those in more urbanized areas, or to obtain necessary goods and services for their families. Rural corridors and communities often see a plethora of medium and heavy-duty trucks transporting goods, as well as large farm equipment, and recreational vehicles. Rural communities need wide-ranging public Electric Vehicle (EV) charging options beyond light-duty vehicles that can meet a wide range of end users power needs, as well as factor in the time or workforce constraints required during recharging.

California has a storied history of energy unreliability, outmatched by some of the highest energy prices in the nation. Given these challenges, limited battery range and dearth of public charging infrastructure in small towns, rural enthusiasm to transition to EVs can be understandably distressing. However, the furtherance of EV charging

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infrastructure in hard-to-reach areas is a necessary precursor to make the future of this foundational shift viable for all corners and lifestyles. RCRC seeks to ensure rural communities have safe, affordable, and reliable energy that can accommodate community growth and economic development. Transitioning to an electrified transportation sector requires investments in, and improvements to, public infrastructure that can support residents and visitors' charging needs.

### **Charging Infrastructure Market in Rural California**

At present, there are approximately 6,800 EV chargers across RCRC's 40 rural counties, comprising only 7.7 percent of California's total charging network. These same counties represent roughly 65 percent of the state's geography and its roadways, and nearly 15 percent of its population. At the same time, the rate of rural EV sales is only a fraction of the state's entire EV sales rate. For example, in the most underserved 11 rural counties (an area of roughly 40,000 square miles) only 5.8% of vehicle sales are electric—likely correlated with the fact that there are only 368 public EV chargers in this vast area.

Electric vehicle charging momentum is likely to diminish as the “most feasible” sites for charging are built-out, and the more challenging sites and locations remain, exacerbating geographic inequity of EV accessibility. We recognize that in more densely populated markets, EV charging project costs are likely to be lower given the economies of scale, and revenues from greater utilization will be higher, naturally attracting private industry investments to these “shovel-ready” sites.

While the state and federal government have committed billions of dollars to expand incentives to both consumers and for EV charging infrastructure, grants for charging infrastructure often go to projects that are otherwise financially viable. That is why publicly supported EV infrastructure subsidies should be targeted toward hard to serve rural and disadvantaged populations, including more remote areas that are not adjacent to major highways and thoroughfares. EV charging infrastructure in these locations requires wrap-around support, including technical assistance, infrastructure enhancements (such as broadband capabilities and energy interconnections), environmental planning, on-going loss offset, and maintenance considerations.

### **Lack of Accessible Technical Assistance/Funding Model Examples**

One major fiscal and planning challenge for rural local government agencies is a lack of tested financial models for public EV infrastructure. Stable funding sources have long presented a challenge with highway or bridge maintenance, and EV charging facilities in more rural and remote areas may not prove sustainable without consideration of similar long-term needs. Even in densely populated urban areas, EV charging networks can suffer from high rates of charger inoperability.<sup>1</sup> In rural and disadvantaged communities, the challenge of maintaining charger networks only compounds, and rural areas may lack the capacity to provide widespread alternatives when a particular charger

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<sup>1</sup> See *Reliability of Open Public Electric Vehicle Direct Current Fast Chargers* (UC Berkeley; April 7, 2022).

goes down. Stranded assets are a concern in rural communities where end-user adoption may be slow. Without a stable and sustainable funding source to maintain rural charging networks, rural and/or disadvantaged charging networks may be rendered inoperable much faster than they were built up in the first place. Oversight will be needed to ensure public charging is reliable and bolster consumer confidence.

### **Energy Challenges**

Distribution capacity, interconnection timeframes, and energy reliability present a significant barrier to achieve the state's broad electrification goals in many rural communities. Many of our local governments have been told it will take anywhere from 2-7 years to improve utility distribution systems for additional capacity to support normal growth and facilitate economic development. Such delays will frustrate much more than the efforts to install electric vehicle charging systems, it will also complicate the state's efforts to decarbonize existing residential and multi-family buildings—many of which may need costly electrical panel upgrades to accommodate EV charging at home. Similarly, these challenges extend to public and commercial workplaces seeking to offer employees or customers EV charging opportunities. RCRC is doing its part to strategically position our counties for the future of transportation (such as streamlining local permitting) as well as ensure there is safe, reliable and affordable energy that can ensure rural towns can serve the needs of their residents, businesses, and visitors to drive economic growth. We recognize the massive boon that this infrastructure can have to meet the needs of our workforce and for tourism-based economies in our rural areas.

RCRC appreciates the opportunity to provide these written comments in advance of the hearing. If you should have any questions, please do not hesitate to contact me at [lkammerich@rcrcnet.org](mailto:lkammerich@rcrcnet.org).

Sincerely,

A handwritten signature in blue ink that reads "Leigh Kammerich". The signature is fluid and cursive, with the first name "Leigh" written in a larger, more prominent script than the last name "Kammerich".

LEIGH KAMMERICH  
Policy Advocate

cc: Members of the Assembly Utilities and Energy Committee  
Members of the Assembly Select Committee on Electric Vehicles and  
Charging Infrastructure  
Laura Shybut, Chief Consultant, Assembly Energy and Utilities Committee  
Gino Folchi, Consultant, Assembly Republican Caucus