GRID ALTERNATIVES

Smart Electric Power Alliance

# UTILITY PLAYBOOK

## Creating an Affordable EV Charging Program for Low-Income Renters and Multifamily Housing

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## About

GRID Alternatives is the country's largest nonprofit that makes renewable energy technologies like solar power, battery storage, EV charging, and EVs accessible to underserved communities. Thanks in part to generous philanthropic support from General Motors and others, GRID Alternatives supports utilities and other electric providers to design, implement, and evaluate EV charging projects for low-income EV drivers, including renters, multifamily affordable housing communities, and low-income homeowners. For more information, visit **www.gridalternatives.org**.

GRID Alternatives partnered with the Smart Electric Power Alliance (SEPA) to produce this playbook. SEPA, a 501(c)(3) organization with over 1,000 members, accelerates the transition to a clean, affordable, and resilient electricity system for all. SEPA engages with its diverse membership—which includes utilities, policymakers, regulators, and technology companies—through education, collaboration, and convening, and the search for innovative policy, regulatory, and technology solutions. For more information, visit **www.sepapower.org**.

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## Playbook Objective

This Utility Playbook offers an outline for utilities and electricity providers seeking to address the problem of low-income renters and those living in multifamily housing paying more for charging their EVs at public chargers than if they were charging at home, a problem we call the "renter's penalty." Several pilot projects are discussed, demonstrating the various implementation models possible.

## Intended Audience

This playbook is tailored specifically for decision-makers and planners within the utility ecosystem, including investor-owned utilities (IOUs), municipal and other public power utilities, electric cooperatives, community choice aggregators (CCAs), and state public utility commissions.

## The Phases

Designed to walk you through the recommended steps to develop an affordable public charging program for low-income renters and multifamily housing residents, this playbook is broken into three phases with pilot program snapshots provided at the end.

## The Purpose

Rather than advocating for a single operational model, this resource serves as a practical blueprint for utility executives, regulatory affairs teams, and program managers. This playbook is not intended to provide guidance on each step of program creation or to be comprehensive of every type of program, but it aims to showcase the possibilities and encourage further research.

# TECHNICAL BRIEF

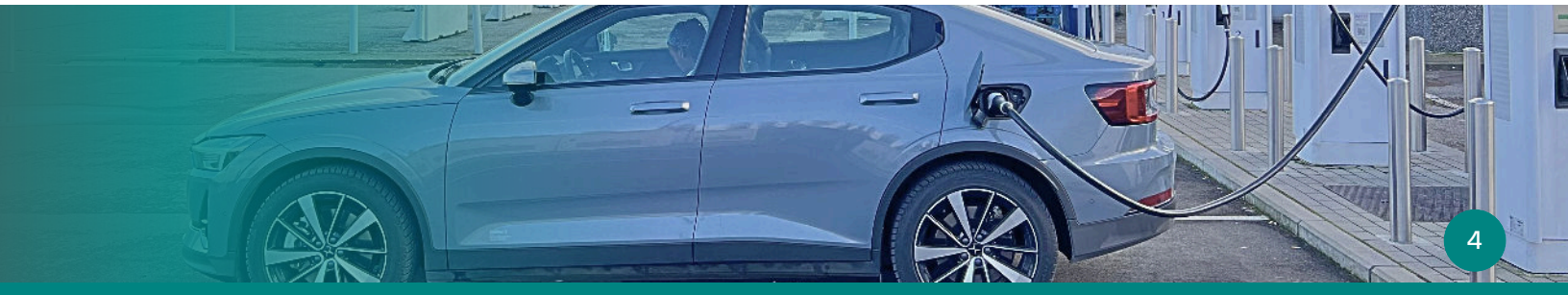
Transportation electrification is creating a structural rift in affordability between electric vehicle (EV) drivers with access to low-cost, regulated residential electricity rates and those without. The EV drivers without reliable charging tied to their residential meters, typically renters and multifamily housing (MFH) residents, rely on public charging infrastructure. For these residents, public charging is an essential, yet high-cost necessity. This "renter's penalty," where charging at a public DC fast charging station **costs up to 6 times more than charging at a single-family home**[1], erases the primary economic benefit of switching to an EV.

While installing dedicated charging infrastructure directly at MFH properties is the ideal remedy, deployment is frequently bottlenecked by the split-incentive barrier. Property owners must bear the upfront capital and civil construction costs of site upgrades, yet they do not capture the operational fueling savings realized by their tenants. Portable discounts offer an elegant software-based bridge over this physical barrier. By anchoring the financial benefit directly to the customer's utility account and delivering it dynamically via mobile applications or networked chargers, utilities can provide customer-specific rate relief across a broad network of participating public or shared chargers, bypassing the landlord's meter entirely.

From an asset management perspective, bridging the renter's penalty drives market growth among an expanded renter demographic. Rather than serving as an unrecoverable subsidy, addressing this cost barrier expands the systemic power delivery, allowing utilities to capture new gas-to-electric revenue. When paired with off-peak managed charging incentives, this expanded load improves the utility's overall system load factor. Ultimately, spreading fixed grid infrastructure costs across an increased volume of territory-wide kilowatt-hour sales optimizes system utilization and reduces the net cost of service for all ratepayers.

As entities that already manage income-qualified discount frameworks, utilities are uniquely positioned to administer these affordability extensions at public or shared multifamily chargers. By designing programs tailored to low-income renters and MFH residents, utilities can ensure that financial relief moves dynamically with the driver. A well-designed program can minimize the renter's penalty, providing a consistent, predictable fueling cost for every driver across the service territory. Utility regulatory models and statutory permissions regarding EV charger ownership vary drastically by jurisdiction. In competitive market states, public utility commissions may explicitly prohibit investor-owned utilities from owning or operating public charging infrastructure to prevent market distortion. Conversely, other states actively mandate utility-led rate-basing of public chargers. This playbook is intentionally designed to describe various models and scales across this full spectrum of involvement and offers an outline for utilities seeking to operationalize these affordability frameworks. Several active pilots and emerging concepts are discussed, demonstrating the possible integration models. Because each utility territory faces distinct regulatory boundaries and localized market barriers, this playbook aims to showcase innovative design options and guide further regional program design.

1 Kandhra, D., MacCurdy, D., & Lipman, T. (2024). Multifamily Households Across California are Paying a Lot More to Charge Their Electric Vehicle. UC Office of the President: University of California Institute of Transportation Studies.



# PROGRAM DESIGN & FEASIBILITY FRAMEWORK

## Phase 1: Program Conception & Feasibility Alignment

This foundational phase combines asset audits, gap analyses, and regulatory cost-recovery structuring. By synchronizing internal and external audits with new opportunities, utilities can secure executive organizational buy-in and clear commission hurdles before launching customer-facing elements.

### I. Understand and Commit to Addressing the Renter's Penalty

- Charging Gap Analysis: Map third-party charging locations, prices, and EV adoption rates within utility territory. Cross-reference with low-income customer demographics and localized EV adoption rates to identify service gaps.
- Quantify the Renter's Penalty: Compare residential electricity rates with public charging costs to determine the affordability gap and the discount required to reach economic parity.
- Institutional Alignment: Confirm commitment across the necessary teams. There must be cross-functional dedication to and shared goals for addressing the renter's penalty. This alignment is most successful when supported by a formal, top-down equity mandate.

### II. Regulatory Justification and Policy Drivers

While a high energy burden highlights a critical need, it does not automatically grant a utility regulatory authority to build public EV charging infrastructure. To justify spending capital and administrative resources, utility programs must align with traditional resource planning and specific regulatory drivers, such as:

- Statutory and Policy Obligations: Meeting codified equity targets, state transportation electrification mandates, or specific utility commission directives.
- Market Adoption Stabilization: Mitigating systemic bottlenecks to ensure electrification goals are met across all customer segments.
- Environmental Justice and Decarbonization: Supporting state or municipal emissions reduction goals by curtailing localized mobile-source pollution in highly impacted communities.
- System Optimization: Managing the load impacts of transportation electrification on the distribution grid to ensure long-term reliability.

### III. Assess Internal Low-Income Subsidization Programs

Determine the objectives of low-income bill subsidization and how rate schedules will be adjusted to ensure low-income bill discounts remain impactful while ensuring fair cost allocations across the income spectrum.

### IV. Internal Asset & Capacity Audit

The first phase of the audit determines the utility's operational readiness to administer an affordable EV charging program for renters and MFH residents. Utilities should evaluate:

- Charging Infrastructure: Assess the health, location, and utilization of existing utility-owned chargers.*
- Programmatic Compatibility: Map how a new discount aligns with current Transportation Electrification Plans (TEP), low-income mandates, bill subsidies, and charging discount programs.
- Operational and Technical Capacity: Evaluate staffing to determine whether existing billing systems can handle an income-qualified program not tied to a meter. This includes assessing staff bandwidth to manage the ongoing verification workflows required for the new program.
- Authentication and Security Architecture: Review the utility's technical capacity to support robust customer authentication, cross-platform data sharing, and real-time eligibility verification. The system should be created to prevent duplicate enrollments, account sharing, and programmatic misuse across third-party networks.
- Financial Capacity: Establish a clear investment ceiling. Identify non-ratepayer funding sources to mitigate concerns of cross-subsidization between customer classes.

* Utility regulatory models and statutory permissions regarding EV charger ownership vary drastically by jurisdiction.

# PROGRAM DESIGN & FEASIBILITY FRAMEWORK

### V. External Market & Regulatory Audit

Map the external environment to identify where the benefit will be deployed, the baseline economic gap for customers, and the regulatory boundaries governing the program.

- Regulatory Guardrails: Consult with the regulatory affairs team on applicable laws and regulations governing utility operations and how they will inform program design.
- Stakeholder Identification: Identify and verify potential community-based organization partners to assist with outreach and third-party eligibility-verification platforms to streamline enrollment.

### VI. Funding Mechanisms

For any affordable EV charging program to clear regulatory scrutiny, the cost-recovery method must be explicit. Regulators and ratepayer advocates will reject programs that create an unfair risk of cross-subsidization, in which non-participating, low-income customers subsidize EV drivers. Utilities should align their programs with one of four distinct funding pathways based on their specific corporate structures and regulatory environments.

**Non-Ratepayer Clean Fuel Credits**

In jurisdictions with active clean fuel standards (California's Low-Carbon Fuel Standard, Oregon's Clean Fuels Program, Washington's Clean Fuel Standard, and New Mexico Clean Fuel Standard), utilities can fully fund public charging discounts by monetizing the environmental credits they generate from residential charging. This pathway has the potential to create a self-sustaining funding pool with minimal impact on the utility's base rates.

**Ratepayer-Funded Public Benefits Charges**

In states with legislative mandates for transportation electrification or energy equity, utilities can seek authorization to fund these discounts via a minor adjustment to an existing System Benefits Charge (SBC) or a dedicated multi-year TEP rider. To secure approval, utilities may need to demonstrate broader system and customer benefits, including improved utilization of existing infrastructure and increased electricity sales.

**Municipal/ Cooperative Operating Margin Reinvestment**

Funding can come directly from localized revenue margins or clean energy funds, with the program viewed as a community reinvestment that drives local economic health and prevents grid strain.

**State or Federal Grants**

Utilizing non-repayable external capital, such as state-level greenhouse gas reduction funds, allows utilities to run multi-year pilot programs without using ratepayer capital. This serves as a low-risk mechanism for building a proof of concept before seeking permanent rate integration.

# PROGRAM DESIGN & FEASIBILITY FRAMEWORK

## Phase 2: Customer Engagement & Collaborative Program Design

This phase transitions from internal capacity mapping to external program development and prioritizes authentic community co-creation, standardized affordable housing terminology, and standardized low-to-moderate-income (LMI) eligibility metrics.

### I. Public Stakeholders and Community Co-Creation

- Strategic Best Practice: Develop a formal public stakeholder process that intentionally co-creates programs directly with the community. Utilities should avoid unilateral program development, which risks community distrust, customer burnout, and capital misallocation in areas where infrastructure does not align with community needs.
- Early-Stage Relationship Building: Engage community-based organizations (CBOs) and regional leaders during the early brainstorming and concept phases to identify localized charging friction points.

### II. Codified Enrollment and Eligibility Verification

Utilities should utilize codified benchmarks recognized by state or federal entities to track and verify eligibility parameters, such as **Area Median Income**, **Federal Poverty Level**, and Location-Based and Geographic Metrics.

Since an EV charging program for public and on-site MFH chargers will be implemented across multiple physical locations, the verification framework should be designed to prevent duplicate enrollments, account sharing, and fraud. Furthermore, because the program may follow various pathways to administer these incentives, the framework should be flexible enough to secure the discount delivery mechanism across all potential channels.

- Automated Direct Sync: **Cross-references customer enrollments** with existing public assistance programs and minimizes administrative duplication.
- Third-Party Clearinghouse: Leverages community-based organizations or specialized identity verification vendors to authenticate customer eligibility before issuing program credentials.
- Manual Verification: Utilizes internal utility staff to audit applications and proof of residency. This lowers implementation costs but increases processing times and limits program scalability.

### III. Benefit Delivery Mechanics

The chosen delivery mechanism dictates the complexity of the utility's IT integration and the customer experience. Utilities can also implement a blended, multi-layered strategy that integrates both models to eliminate the "renter's penalty" more robustly.

- Portable Discount: This mechanism utilizes open-standard communication protocols, specifically the Open Charge Point Interface (OCPI), paired with secure, real-time Application Programming Interfaces (APIs) to establish a dynamic link between the utility's customer information system database and third-party Charging Station Operators. When an enrolled income-qualified driver initiates a charging session via a mobile app, RFID card, or ISO 15118 (Plug & Charge) interface, the system verifies active enrollment status instantly as the vehicle is plugged in and automatically applies the authorized tariff reduction.
  - Operational Trade-Offs: Demands high upfront IT overhead, extensive cross-platform software configuration, and rigorous cybersecurity vetting to protect customer data across external networks.
- On-Bill Credit: This framework bypasses the need for real-time edge-device communications in favor of asynchronous batch processing or retrospective customer ledger verification. Under this mechanism, the utility applies the calculated financial relief directly to the user's primary residential electric utility account statement after the charging events have occurred. This delivery mechanism operates via two distinct data pathways, depending on the infrastructure type: public third-party networks or on-site infrastructure via virtual submetering.
  - Operational Trade-Offs: Incurs the lowest upfront technical integration costs. It can be deployed rapidly by modifying existing utility billing software without modifying third-party station firmware or requiring real-time network communication integrations.

# PROGRAM DESIGN & FEASIBILITY FRAMEWORK

- Prepaid Charge Card: The utility provisions, registers, and funds dedicated to closed-loop accounts or physical RFID cards managed through a centralized transaction clearinghouse vendor. These accounts are pre-loaded with a specified dollar amount or a strict monthly kWh allotment. The operational parameters of the card or digital wallet are hard-coded to be valid exclusively within either the network of utility-owned chargers or a pre-approved ecosystem of public or quasi-public charging networks that have executed interoperability agreements with the utility.
    - Operational Trade-Offs: Separates the low-income incentive program from the utility's core billing process, significantly reducing internal software engineering labor. However, it introduces separate administrative logistics workflows for digital clearinghouse auditing, card distribution, and management.
- Network-Tethered Fixed Discounts: The utility applies a fixed discount percentage directly onto the standard kWh tariff at its own utility-owned and operated public or quasi-public charging stations. This delivery mechanism bypasses third-party roaming integration layers and open APIs by anchoring the rate relief directly inside the utility's proprietary software platform and physical charging network assets. For utilities with existing charging footprints, this is operationalized entirely through software by establishing a pricing tier within the network's management backend, creating an immediate point-of-charge discount for validated low-income accounts. This grants the utility comprehensive operational control over hardware uptime, charge-rate application, and localized charging-session data collection, while providing a simplified regulatory approval process, separate from traditional, complex rate-basing frameworks.
    - Operational Trade-Offs: This delivery mechanism restricts the program's financial benefits strictly to the utility's own physical site footprint, which can create gaps if utility chargers are not widely distributed in LMI areas. While using an existing utility charging network incurs minimal software-side deployment costs, any future expansion or geographic scaling of the program requires capital-intensive physical infrastructure (siting, civil construction, and hardware installation), rather than leveraging existing third-party commercial networks. Additionally, it requires manual qualification and discount tier configuration on customer network accounts.

**IV. The Utility as an Enabler: Cultivating Ecosystem Partnerships**

To help scale energy affordability for renters, utilities can also act as network system enablers without the need for ownership and operation of infrastructure. When working with charging station operators, the utility may act as a data and financial clearinghouse using open APIs to dynamically pass through low-income rate reductions across existing third-party networks. In leveraging relationships with community-based organizations, the utility may act as an administrative coordinator, collaborating with trusted local groups to streamline income-verified workflows and execute hyper-targeted outreach. In these potential scenarios, embracing an enablement model minimizes stranded-asset risk for utilities and limits ratepayer cross-subsidization concerns, while allowing the market to scale flexibly as EV adoption increases.

# PROGRAM DESIGN & FEASIBILITY FRAMEWORK

## Phase 3: Program Implementation & Operational Outreach

**I. Operational Scope and Network Integration**

Utilities should determine the boundaries of the charging network where the program will apply.

- Utility-Owned Infrastructure: Limits program exposure to utility-managed chargers. While this simplifies rate application and data collection, it restricts access for multifamily residents who rely on broader commercial charging networks.
- Third-Party Network Integration: Leverages established charging networks and maximizes geographic coverage, but requires formal agreements or data-sharing partnerships with third-party Charging Station Operators (CSOs).

**II. Targeted Outreach**

Solutions should be created in a way that communicates the opportunity to effectively reach the necessary customer demographic without generating confusion. Outreach strategies should move beyond standard bill inserts, which rarely reach renters who pay sub-metered or bundled utility bills, and focus on localized, text-based campaigns, direct multifamily property owner partnerships, and point-of-sale digital notifications within third-party charging apps. To remove language barriers, all programmatic messaging, apps, and forms should incorporate diverse multi-language options tailored to the primary languages spoken within target priority census tracts.

# PILOT SNAPSHOTS

## Real-World Frameworks

Moving from a program design and feasibility framework to operational outreach requires navigating distinct regulatory boundaries and localized markets. Because utility regulatory models vary widely across jurisdictions, there is no single pathway to address the renter's penalty. What clears regulatory scrutiny for an investor-owned utility navigating public utility commission guidelines may look completely different from the framework deployed by a community-owned public utility or a Community Choice Aggregator.

To guide further regional program design, this section details several active pilots and emerging concepts. These snapshots showcase how various utilities are balancing internal technical capacity against regional guardrails through a range of delivery mechanisms.

Rather than offering a single operational blueprint, these snapshots demonstrate the possible integration models and cost-recovery pathways across a full spectrum of involvement. By analyzing how these entities align specific regulatory drivers with tailored outreach and technical architectures, utilities can determine the optimal approach for their own territory-wide implementation.

**Regulatory Justification & Policy Drivers**

Market Adoption Stabilization; System Optimization

**Funding Source**

Municipal/Cooperative Operating Margin Reinvestment (CCA Procurement Margin Reinvestment)

**Benefit Delivery Method**

On-Bill Credit

**Status**

Active Pilot

Initial technology validation was initiated in late 2023.

Multifamily property blocks have scaled through 2026 via targeted innovation grants.

### Silicon Valley Clean Energy and Peninsula Clean Energy

Silicon Valley Clean Energy (SVCE) and Peninsula Clean Energy (PCE) implemented a hardware-light approach to expanding multifamily EV charging, focusing on virtual submetering. By embedding software within or next to the smart charger to isolate EV charging data from a building's primary meter, this framework requires low capital expenditure and eliminates intensive on-site civil construction, allowing the load to be mapped directly to a resident's utility account while enabling property owners to capture demand charges. Because these entities serve as Community Choice Aggregators (CCAs) tied to the incumbent IOU's (Pacific Gas & Electric) physical billing architecture, they operate under strict submetering protocols explicitly authorized by the CPUC. However, execution relies entirely on seamless utility data integration, active cooperation from property owners, and formal tenant data-sharing agreements. Any localized communication dropouts or data transmission lags between the third-party charging hardware, the data aggregator, and the utility billing systems can directly delay monthly statements.

# PILOT SNAPSHOTS

## California Investor-Owned Utilities

Building on foundational work by the California Air Resources Board, California's main investor-owned utilities have secured regulatory approval to invest over $60 million of Low-Carbon Fuel Standard (LCFS) revenue to fund prepaid charging credits that interface with third-party chargers for income-qualified drivers. Operating under the California Public Utility Commission (CPUC), this strategy allows IOUs to utilize LCFS revenue to bypass the general rate case process typically required to justify an income-qualified public fuel subsidy. This framework provides a least-cost solution that addresses the renter's penalty without placing an additional financial burden on non-participating customers. However, it remains exposed to funding volatility from credit market fluctuations and payment control risks requiring secure vendor integrations.

**Regulatory Justification & Policy Drivers**

Statutory and Policy Obligations; Environmental Justice and Decarbonization

**Funding Source**

Non-Ratepayer Clean Fuel Credits

**Benefit Delivery Method**

Prepaid Charge Card

**Status**

Early Pilot

## Redwood Coast Energy Authority

**Regulatory Justification & Policy Drivers**

Environmental Justice and Decarbonization; Market Adoption Stabilization

**Funding Source**

State and Federal Grants; Blended with CCA Operating Margin Reinvestment

**Benefit Delivery Method**

Network-Tethered Fixed Discount

**Status**

Active Pilot

Launched in early 2026 as a small-scale model focusing on community support through 66 ports. The total number of participants is less than 200.

The Redwood Coast Energy Authority (RCEA) leverages its position as another CCA to manage a network of CCA-owned EV chargers in one of California's lowest-income regions. RCEA provides discounts at its REVNet stations to enrolled income-qualified customers. In this rural-focused model, RCEA coordinates closely with community-based organizations to facilitate outreach to customers. This hands-on approach allows RCEA to improve access to public EV charging and increase the use of its charging infrastructure assets. However, this program can be difficult to scale across larger, multi-jurisdictional utility territories and is generally constrained by regional operational budgets.

*Photo Credit: Redwood Coast Energy Authority*

# PILOT SNAPSHOTS

## Puget Sound Energy

Puget Sound Energy (PSE), Washington State's oldest and largest energy utility, is piloting a direct energy burden reduction model, providing discounts to income-qualified customers at its utility-owned and operated public charging stations. Under this framework, customers enrolled in PSE's Bill Discount Rate program receive a fixed discount percentage on the kWh rate at their utility-owned Up & Go Electric public charging network, bringing public fueling closer to economic parity with residential off-peak rates. PSE limited the pilot to its proprietary hardware to first establish the proof-of-concept, ensure more direct oversight of the technology solution, and assess the customer experience to identify key enhancement opportunities. This network-specific approach grants the utility greater operational control over hardware uptime, charge rate applications, and data collection while utilizing existing vendor agreements and approved regulatory tariffs separate from traditional rate cases. However, it restricts the programmatic footprint to utility-owned infrastructure, requires high upfront capital deployment to expand the charging network, and introduces administrative friction via manual qualification and account configuration workflows.

**Regulatory Justification & Policy Drivers**

Statutory obligations for transportation electrification reinvestments with CFS credit revenues

**Funding Source**

Washington State Clean Fuel Standard Program Credit Revenues

**Benefit Delivery Method**

Network-Tethered Fixed Discount

**Status**

Active Pilot, capped at 200 participants.

Launched in October 2025 with continuous recruitment and evaluation through 2026/27.

**Regulatory Justification & Policy Drivers**

Market Adoption Stabilization; System Optimization/ Reliability

**Funding Source**

Municipal/Cooperative Operating Margin Reinvestment

**Benefit Delivery Method**

Portable Discount

**Status**

Development / Planning

Software validation in progress

Pilot phase launch anticipated in Q1 2027

## Sacramento Municipal Utility District

Sacramento Municipal Utility District (SMUD) is developing a smartphone app for access to public charging through a unified EV charging network by utilizing the ChargeHub roaming platform and direct integration with the utility's internal systems. This digital interface allows customers access to charging at both utility-owned and third-party public chargers, enabling SMUD to pass targeted discounts directly to eligible income-qualified drivers and rideshare operators while directly influencing charging behavior. These tight software integrations enable hyper-targeted customer pricing to support strategic goals, support affordability, and automate the reporting of non-sensitive session data to state regulators. Furthermore, as a community-owned public utility, SMUD had more regulatory flexibility to own and operate public chargers and explore innovative public-private partnerships to maintain them given limited internal resources. However, the model requires high internal IT overhead to integrate and validate end-to-end function. Program efficacy is directly exposed to the reliability and uptime of multiple third-party platforms.

## THE STRATEGIC PATH FORWARD

Resolving the renter's penalty is rarely a single-model choice. Utilities can leverage a layered framework that sequences distinct interventions over time. By transitioning from near-term, low-capital software solutions, such as prepaid cards and unified app integrations, to mid-term virtual submetering data frameworks, utilities can deliver immediate financial relief through existing networks while their internal billing systems mature. This pathway can culminate in targeted, long-term physical infrastructure investments in utility-owned public or multifamily charging assets where commercial deployment has failed to build. Ultimately, executing this phased strategy offers utilities a set of robust options to support affordable electric fuel for low-income EV drivers. Using a layered approach, utilities can safeguard ratepayer funds from stranded-asset risks and optimize overall grid utilization while aligning immediate initiatives with long-term integrated resource planning.

# LET'S DO THIS

**Reach out, and we can be a thought partner!**

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