

**DOCKETED**

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**ChargePoint Comments CTP Investment Plan Update 2025 - 2026**

*Additional submitted attachment is included below.*



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November 7, 2025

California Energy Commission  
715 P Street  
Sacramento, CA 95814

Subject: ChargePoint Comments on California Energy Commission's Proposed 2025–2026 Investment Plan Update for the Clean Transportation Program

Dear Commission Skinner and Energy Commission Staff,

ChargePoint appreciates the opportunity to provide comments on the proposed 2025–2026 Investment Plan Update for the Clean Transportation Program.

ChargePoint has established itself as the leader in electric vehicle (EV) charging innovation since its inception in 2007, long before EVs became widely available. The company provides comprehensive solutions tailored to the entire EV ecosystem, from the grid to the dashboard of the vehicle. The company serves EV drivers, charging station owners, vehicle manufacturers, and similar types of stakeholders. With a commitment to accessibility and reliability, ChargePoint's extensive portfolio of software, hardware, and services ensures a seamless charging experience for drivers across North America and Europe. ChargePoint empowers every driver in need of charging access, connecting them to over 1.25 million charging ports worldwide. ChargePoint has facilitated the powering of more than 16 billion electric miles, underscoring its dedication to reducing greenhouse gas emissions and electrifying the future of transportation.

Please see below for our comments on California Energy Commission (CEC) staff's recommendations regarding the 2025–2026 Investment Plan Update:

Light-Duty Charging Infrastructure:

- + Prioritize funding for block grants: We recommend prioritizing funding for light-duty charging infrastructure for block grants, with a focus on AC charging offered through Communities in Charge (CIC), over traditional Grant Funding Opportunities (GFOs). Based on our direct experience with many different CEC solicitations and program types, block grants allow for greater participation by increasing the number of eligible applicants that can access these important grant dollars. With CEC's block grant programs typically posing less of an administrative burden on applicants due to simplified application processes and minimized reporting requirements, a larger number of applicant types are enabled and encouraged to apply for funding, as they may not have the resources or expertise to otherwise apply for a GFO. From an equity standpoint, CEC's block

grant programs allow more applicant and site types and a more diverse applicant pool to participate in CEC's generous funding programs.

- + Expand eligibility in Communities in Charge: We recommend that eligible site types in CIC be expanded again as in previous waves to include all site types serving Level 2 charging. While we support the prioritization of charging at multifamily properties, adding Level 2 ports at workplaces and in other publicly accessible locations where people drive and park encourages adoption and can also help to get people behind the wheel of an EV. A consistent and predictable block grant program with similar eligible site types and opportunities for the broadest set of applicants can build confidence and allow future applicants to begin planning now, knowing they will have an opportunity to apply in the next wave. There is already significant NEVI funding in place for DC fast charging, including the \$73M recently awarded, another \$73M program planned for corridors in an upcoming GFO, leaving \$227M remaining, some of which could go towards AC and community charging in public locations once Fully Built Out status is declared.
- + Establish predictable funding cycles: We also express our strong support for CEC to establish predictable, multi-year funding cycles for critical block grant programs such as CIC and the California Electric Vehicle Infrastructure Project (CALeVIP). Because the program is designed to streamline deployment with shovel-ready projects, obtaining a permit and utility approved designs require significant preparation and risks undertaken by the Applicant. Predictable funding would allow potential applicants to understand time constraints and consider future projects more seamlessly, resulting in more program participation and continuous deployment.

#### Medium- and Heavy-Duty Charging Infrastructure:

- + Provide funding for light-duty fleet charging: ChargePoint observes that, among CEC's funding for fleet charging, there has been a notable gap in funding for light-duty (LD) fleet charging in recent years. We realize that CEC understands that fleets in California come in all shapes and sizes – from light-duty to medium- and heavy-duty (MDHD), and ask that CEC provide more funding opportunities for LD specifically. ChargePoint suggests CEC consider adding a LD fleet charging lane to EnergiIZE, CEC's flagship fleet block grant program that has been in demand and successful in its four years of implementation so far.
- + Prioritize funding for block grants: ChargePoint recommends that CEC begin to shift its focus from primarily grant funding opportunities (GFOs) to block grant programs in order to increase the impact and extend the reach of CEC funding, particularly as it relates to fleet electrification. While GFOs tend to fund fewer, larger projects, CEC's block grant programs tend to fund a greater number of projects, although they may be smaller on average than projects funded by GFOs. We support CEC's greater focus on its existing block grant programs to encourage a wider variety of awarded projects across the state by a wider variety of applicants (namely, fleet types). With CEC's block grant programs typically posing less of an administrative burden on fleet applicants due to simplified application processes and minimized reporting requirements, a larger number of small fleets are enabled and encouraged to apply for funding, as they may not have the resources or expertise to otherwise apply for a GFO. From an equity standpoint, CEC's block grant programs allow more fleets, additional small fleets, and a greater diversity of fleets to participate in CEC's generous funding programs.



- + Continue to support predictable funding for MDHD: ChargePoint recognizes and appreciates the generous funding that is currently available for MDHD EV charging through CEC's GFOs. However, robust program funding for MDHD charging must continue in future years in order to provide strong signals and assurances to the MDHD charging market that incentives are predictable and can be relied upon, which will help strengthen the industry in its entirety in the long run.

Thank you for the opportunity to provide feedback on staff's proposed Investment Plan Update. If you have any questions regarding our comments, please don't hesitate to contact me directly.

Sincerely,

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