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RIVIAN

November 18, 2025

Commissioner Skinner
California Energy Commission
Docket No. 22-EVI-01
715 P Street
Sacramento, California 95814

RE: Docket 22-EVI-01 and California Electric Vehicle Infrastructure Project 2.0

Dear Commissioner Skinner and Staff,

Rivian applauds the Commission's ongoing work on the California Electric Vehicle Infrastructure Project 2.0 and would like to highlight it as one of the most effective funding programs currently available nationwide for deploying DC fast charging infrastructure. We write to encourage the Commission to continue its investment in this program as it considers allocation of available funds going into 2026 as well as establish a funding window in the near-term for 2026 funding opportunities. We also provide additional feedback below regarding program design we encourage the Commission to evaluate as it considers future funding rounds, specifically regarding site verification forms and connector standards.

Keeping the World Adventurous Forever

Founded in 2009, Rivian is an independent U.S. company headquartered in Irvine, California, with all Rivian vehicles manufactured in the US. With over 14,000 employees across the globe, Rivian's focus is the design, development, manufacture, and distribution of electric, zero emissions vehicles, ranging from pickups and full-sized SUVs to commercial vans, to our recently announced R2 and R3 vehicles. It is Rivian's mission to *Keep the World Adventurous Forever* by displacing the highest polluting vehicles on the road today as well as ensuring those vehicles are powered reliability and with clean energy.

In addition to our vehicles, Rivian is also a manufacturer of direct current fast chargers (DCFC) and deploys, owns, and operates those chargers under a nationwide charging network – the Rivian Adventure Network. Since launching in 2022, the network has deployed over 800 DC fast charging ports nationwide at over 120 sites, with 85% of those sites now open to all EVs, with more coming soon. Rivian has also started transitioning

portions of charging sites to the SAE J3400 NACS connector in anticipation of the growing base of vehicles with native NACS charging inlets coming to market. Rivian's commitment to charging reliability has been demonstrated through the Rivian Adventure Network's high uptime rates of 97%+, achieved via our vertical integration and robust operations and maintenance support.

Continue investment in CALeVIP and establish a 2026 funding window.

We encourage the Commission to continue its investment in CALeVIP given its streamlined rebate program structure. In comparison to grant funding opportunities, rebates programs have historically resulted in faster deployment of charging infrastructure due to fewer delays in the administration and release of funds. In addition, rebate programs like CALeVIP have proven to be less administratively intensive for both applicants and funding agencies as well as more predictable for industry to plan for. This predictability will continue to be a critical component of California continuing its leadership in clean transportation and is therefore why we encourage the Commission to establish an expected funding window for the CALeVIP program in 2026 as soon as possible. We support continuing rolling funding applications during announced funding windows to allow applicants flexibility given the dynamic nature of charging site development.

Consider adjustments to existing Site Verification Forms.

Again, we strongly support the continued investment in the CALeVIP program for accelerating DCFC infrastructure for the light-duty electric vehicle market. Its current iteration under FCCP-1 has lowered the administrative burden on both applicants and program staff, and we applaud those program design improvements. However, we believe the current Site Verification Form, which designates commercial property owners as "Obligated Parties" bound by extensive terms and conditions, has created significant friction in achieving the CALeVIP program's deployment goals. While commercial landlords view EV charging stations as a valuable amenity, they lack the operational expertise and legal willingness to accept liability for contractor and EVSE network operator obligations, specifically those related to prevailing wage, EVITP, uptime guarantees, and data reporting. This perceived risk has triggered prolonged lease renegotiations in some cases, creating unnecessary administrative burdens for both applicants and program staff. The administrative complexity is further exacerbated by the inconsistent use of critical terminology (e.g., "site host," "site owner," "property owner") across various program documents, which delays the accurate and timely completion of mandatory Site Verification Form as part of the application submission materials, which could delay or disqualify applicants from successfully enrolling their project in the program.

To streamline program implementation and accelerate the deployment of charging infrastructure, we recommend that future program design remove property owners from the status of an "Obligated Party" under the Site Verification Form. The recommendation is to replace this binding requirement with a "letter of authorization" that confirms site access and control and intent for property to maintain chargers per its terms in its lease agreement with the EVSE network operator without introducing new liability for the landlord. Furthermore, to eliminate persistent administrative confusion and the resulting delays, program literature, application materials, and the Site Verification Form must be revised to establish the consistent use of standardized definitions for all parties involved, ensuring quick and accurate signature delivery. These recommendations will ensure that more qualified projects can enroll and be considered for future rounds of CALeVIP funding, while reducing the administrative burden for all parties involved.

Allow for increasing percentages of chargers to be deployed with SAE J3400 NACS connectors.

We applaud the Commission for their continued leadership on adapting to a rapidly innovating industry landscape by allowing up to 50% of deployed chargers at a site to have SAE J3400 NACS connectors under the CALeVIP program. As the industry continues to evolve on this front, we encourage the Commission to allow for larger percentages of SAE J3400 NACS connectors at sites funded under CALeVIP and more broadly, the Clean Transportation Program. Several automakers, including Rivian, are now actively selling vehicle models with native NACS charging inlets, with more to come based on automaker announcements. Given this momentum, several leading charging network providers, including ChargePoint, EVgo, EA, Ionna, and Rivian, are already transitioning their charging infrastructure to include NACS charging connectors. The transition to NACS for both vehicles and chargers is therefore already well underway, with even more momentum expected in 2026.

We appreciate Staff's continued efforts to refine the CALeVIP program to meet the evolving needs of California's electric vehicle drivers as well as adjust to an evolving industry landscape. The proposals included above will continue to ensure CALeVIP funding is being deployed in an efficient and effective manner that ultimately supports the continued growth and scalability of electrified transportation in California. We welcome further conversations with Staff on these topics as the next round of CALeVIP is finalized. For follow-up questions please reach out to Brian Jones at bjones@rivian.com.

Sincerely,

Kelsey G. Johnson
Senior Lead Policy Advisor - Energy & Charging
Rivian