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**ChargePoint 2016 - 2017 ALTERNATIVE FUEL AND VEHICLE TECHNOLOGY
PROGRAM Investment Plan Coments**

Additional submitted attachment is included below.



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**CALIFORNIA ENERGY COMMISSION
Docket No. 15-ALT-01
2016-2017 Investment Plan
ALTERNATIVE FUEL AND VEHICLE TECHNOLOGY PROGRAM**

**PUBLIC COMMENTS
Submitted by
ChargePoint Inc.
February 1, 2016**

ChargePoint Inc., appreciates this opportunity to provide comments to the California Energy Commission for the 2016 – 2017 Investment Plan for the Alternative Fuel and Vehicle Technology Program. This program provides an opportunity to develop and deploy technology and alternative renewable fuels in the marketplace to support California's aggressive goal to reduce greenhouse gas emissions to 80 percent below 1990 levels by 2050.

ChargePoint has partnered with the California Energy Commission on AB 118 funding opportunities to manufacture the software systems as well as deploy charging station infrastructure to support electric vehicles throughout the State of California.

BACKGROUND

ChargePoint is a Silicon Valley based manufacturer and network operator for electric vehicle charging services. ChargePoint maintains the largest network of independently owned charging stations in the world and has developed a sophisticated software platform for the integration of electric vehicles on the grid.

ChargePoint operates the largest and most open electric vehicle charging network in the world, with more than 25,700 total charging spots and over 230 Express DC fast charging locations. It is also a California success story, growing from five to over 200 employees in the state since the company was established in 2007. ChargePoint's mission is to get as many people as possible behind the wheel of an EV and to provide a place for them to charge wherever they are—at home, at work, around town, and out of town. To date, ChargePoint has installed more than 11,000 charging stations throughout California at a wide variety of sites—including private residences, multifamily dwellings, and workplaces.



Beyond its extensive experience and growing network of EV drivers, ChargePoint has formed numerous strategic partnerships. For example, ChargePoint was the first EV charging company to partner with major automakers like Chevrolet, BMW, and Nissan. Through ChargePoint's leadership, these competitors have frequently collaborated to invest in a shared EV infrastructure. In one recent example, ChargePoint partnered with BMW and Volkswagen to roll out a DC fast charging network from San Diego, California to Portland, Oregon and Washington D.C. to Boston, Massachusetts. In recognition of the innovative and transformational nature of this work, the United Nations (UN) Climate Change Secretariat awarded "The Momentum for Change Award" to ChargePoint in November 2015. According to the UN, these awards went to organizations implementing "practical, scalable and replicable" examples of what people, government, businesses, government and industries are doing to tackle climate change.

California has been at the forefront of policies that have embraced and encouraged EV deployment and innovation technologies to support EVs by providing strong leadership, regulatory clarity and funding for manufacturing and deployment. California has become and will remain the preeminent market for electric vehicles.

To promote interoperability, a new trade group called Roaming for EV Charging (ROEV) has been formed to enable a single, ROEV-certified access card to work across multiple charging networks and EV charging stations. ROEV is a trade association for the industry to adopt and promote roaming for EV Charging. This effort is similar to efforts that brought together ATM access cards 20 years ago where banking could only be done at bank machines on specific networks. ROEV will allow a card from any of the major EV charging networks to be used at others stations, providing the driver with a simple and easy charging experience no matter which charging network he or she is using. ChargePoint is one of the founding members of ROEV, along with NRG EVgo, Blink, Nissan, and BMW.

In addition, we have engaged with the California Public Utilities Commission since May of 2009 to support the ground breaking policy decisions that have defined the terms of operation and rules of engagement for Electric Vehicle Service Providers in the State of California. ChargePoint has also been a stakeholder in the Governor's EV Action plan and EV Roadmap planning led by CAISO.

We respectfully submit the following input for funding priorities to address the key market gaps for EV infrastructure manufacture, deployment and customer facing programs.

INVESTMENT PLAN RECOMMENDATIONS

Overall, we support the direction and strategic objectives proposed in the Program Areas that support investment in electric vehicle smart charging services. We see the plan as



expanding opportunities for EV deployment established in the 2015-2016 Investment Plans.

The following comments will provide ChargePoint's recommendations to be considered by the Commission in the 2016 -2017 Investment Plan. These recommendations include:

- EVSE Infrastructure Deployment Funding
- Advanced Vehicle Technology Manufacturing Funding

EVSE Infrastructure Deployment Funding

The California Public Utilities Commission (CPUC) recently approved Southern California Edison (SCE) and San Diego Gas & Electric (SDG&E), EVSE Pilot Programs which should be considered when developing EVSE deployment funding opportunities. Proposed funding opportunities should be complementary of the SCE and SDG&E pilots and not duplicate efforts. AB 118 funding should not be allocated to eligible funding categories under the SCE and SDG&E pilots. In addition, deployment efforts should be technology neutral, providing customer choice, subsequently promoting competition among technology providers.

We support the Commission's emphasis on the Multi-Dwelling Unit (MDU) market. With over a third of Californians living in MDUs the challenges in this sector have to be addressed or residents will not be in a position to purchase EVs. Costs associated with upgrading electrical infrastructure to support EVSE tend to be the largest barrier to entry. By leveraging AB 118 funds to provide electrical infrastructure, technology providers will be positioned to provide affordable EVSE services, which may include capital purchase or charging as a monthly service.

RECOMMENDATIONS:

- Close coordination with the CPUC and SCE & SDG&E pilot programs to ensure AB118 funds do not duplicate efforts proposed by Investor Owned Utilities (IOU) EVSE Pilot Programs. Promote technology neutral programs that prompt competition, innovation, and leverage private funds in conjunction with state resources.
- Provide funding for electrical upgrades for the provision of EVSE at MDUs. Allow technology providers to innovate and offer several services and offerings to customer.
- Continue to fund DC fast charging projects.



Advanced Vehicle Technology Manufacturing Funding

In order to encourage investment in California based manufacturing and assembly facilities that produce alternative fuel vehicles, infrastructure, and components, funding for Advanced Vehicle Technology Manufacturing should be maintained. These facilities produce alternative fuel vehicles, infrastructure, and components that help the State meet greenhouse gas emissions reduction goals as well as create jobs, one of the most critical elements to build the economic foundation for California. Furthermore, Advanced Vehicle Manufacturing efforts should be inclusive of EVSE production. EVSEs are paramount to achieving fuel demand reduction goals and continuing California job growth in the EV charging industry, which is currently estimated to provide more than 2,000 California jobs¹.

RECOMMENDATION:

- We recommend \$10M of the Medium and Heavy Duty Vehicle Technology Demonstration and Scale-Up and Manufacturing funding in the 2016 – 2017 Investment Plan include a program directed at Advanced Vehicle Technology Manufacturing for vehicles, refueling infrastructure, and components.

ChargePoint appreciates the opportunity to comment on these important initiatives and look forward to a continued successful working relationship with the California Energy Commission.

Colleen Quinn
Vice President, Government Relations and Public Policy

¹ AEEE Institute, "California Advanced Energy Employment Survey" December 2014