

## DOCKETED

<b>Docket Number:</b>	16-ALT-02
<b>Project Title:</b>	2017-2018 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program
<b>TN #:</b>	214381
<b>Document Title:</b>	ChargePoint Comments ARFVTP 2017-2018 Investment Plan Update
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	ChargePoint
<b>Submitter Role:</b>	Applicant
<b>Submission Date:</b>	11/6/2016 8:42:29 PM
<b>Docketed Date:</b>	11/7/2016

*Comment Received From: John Schott*

*Submitted On: 11/6/2016*

*Docket Number: 16-ALT-02*

**ChargePoint Comments ARFVTP 2017-2018 Investment Plan Update**

*Additional submitted attachment is included below.*



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California Energy Commission  
Docket #16-ALT-02  
2017-2018 Investment Plan Update  
Alternative and Renewable Fuel and Vehicle Technology Program

Public Comments  
Submitted by  
ChargePoint, Inc.  
11/7/2016

ChargePoint appreciates the opportunity to provide written comments on the 2017-2018 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP). This program provides an opportunity to support California's ZEV Action Plan, which sets a goal of deploying infrastructure capable of supporting up to 1 million zero emission vehicles by 2020. ChargePoint has partnered with the California Energy Commission on many ARFVTP funding opportunities in the past to support the deployment of charging infrastructure throughout the state and to develop hardware, software, and manufacturing methods for EV charging stations.

**I. Background**

Headquartered in Campbell, California, ChargePoint is the world's largest and most open EV charging network with more than 31,000 level 2 and DC fast charging spots, including more than 16,700 spots in California. Every 4 seconds, a driver connects to a ChargePoint station and by initiating over 19.4 million charging sessions, ChargePoint drivers have driven over 467 million gas free miles.

## II. Investment Plan Update Recommendations

Overall ChargePoint supports and applauds Energy Commission staff on the Alternative and Renewable Fuel and Vehicle Technology Program Investment Plan Update for 2017-2018. ChargePoint supports the funding amounts, direction, and strategic objectives as it relates to EV charging infrastructure and manufacturing. This plan appropriately expands on opportunities established in previous year investment plans, including the 2016-2017 Plan.

The following comments will provide ChargePoint's recommendations to be considered by the Commission in the 2017–2018 Investment Plan Update. These recommendations include:

- Cross-agency coordination
- Vouchers or rebates
- EV charging industry representative on Advisory Committee
- Funding directed towards underserved communities
- Attach rate goal established for California
- Repair and upgrade of existing chargers
- Smart charging prioritized
- Manufacturing for light-duty vehicle infrastructure

### Coordination:

ChargePoint supports continued cross-agency coordination on EV infrastructure policy and programs. Coordination with the California Public Utilities Commission (CPUC) and the investor owned utilities is needed on SB 350 implementation to ensure that funding is allocated to areas of greatest need in a way that reduces impact on ratepayers and leverages existing private capital. Close coordination is also needed with the California Air Resources Board (CARB) as it relates to the ZEV Action Plan, SB 454 implementation, and the Volkswagen settlement. In particular, as the trustee for the State of California's Appendix D funding, CARB could seek to direct up to 15% of the Appendix D funding towards EV charging infrastructure, which should be done in a way that is complementary to the funding programs from this CEC Investment Plan.

### Vouchers or Rebates:

ChargePoint supports funding mechanisms that provide flexibility and promote customer choice. Vouchers and rebates could be an alternative to the grant programs offered by the CEC under previous Investment Plans. Vouchers and rebates may be awarded through a simpler process for site hosts and other applicants, which may accelerate the deployment of charging stations, greatly reducing grant overhead and administration, and providing increased flexibility. Voucher or rebate programs should always be technology neutral, providing the opportunity for the site host to choose the charging equipment and services of their choice, subsequently promoting competition among technology providers in the market. The rebate program also enables private investment or “skin in the game” to ensure efficient placement of stations.

### EV Charging Industry Representative on Advisory Committee:

ChargePoint feels that the voice and opinions of the EV charging industry are unrepresented on the Advisory Committee. ChargePoint recommends that the CEC appoint a representative of the Electric Vehicle Charging Association (EVCA) to the Advisory Committee. EVCA is a non-profit organization that brings together leaders in the electric vehicle charging industry to educate policymakers, stakeholders and members of the public about the critical role of EV technology, infrastructure and services and to advocate for policies that will expand clean transportation. The EVCA would represent the needs and concerns of the EV charging industry in a vendor-neutral way.

### Underserved Communities:

In addition to SB 350, referenced on page 44 of the draft 2017-2018 Investment Plan Update, ChargePoint supports efforts to encourage EV adoption in low and moderate income communities aligned with the goals of SB 1275 by directing funding towards developing charging infrastructure in these underserved areas. Additionally, funds should be dedicated to underpenetrated markets, including multifamily housing, which continues to be an opportunity for market growth in California.

### Attach Rate Goal:

ChargePoint encourages the CEC, in coordination with other state agencies, to establish an attach rate goal for the number of EV charging stations needed in the state to support 1 million ZEVs by 2020. This goal could build off of the work that the CEC previously completed with NREL and should be calculated specific to different market verticals, including public charging, workplace charging, and residential. The goal should take into account the availability of private charging, recognizing the fact that the majority of EV charging occurs at home.

### Repair and Upgrade of Existing Chargers:

ChargePoint supports the Energy Commission making funding available for the repair and upgrade of existing legacy chargers that are incapable of charging a modern PEV, do not meet current charging standards, or are no longer functional due to equipment failure, damage or vandalism, as described on page 46 of the draft 2017-2018 Investment Plan.

Additionally, all charging stations installed through CEC funded programs should require a five-year maintenance and service contract to ensure stations are operational. ChargePoint offers a maintenance and service contract through its ChargePoint Assure, the most comprehensive parts and on-site labor warranty in the industry. Assure includes station management and service features that provide:

- Unlimited software configuration changes
- 98% annual uptime guarantee
- 1 business day response time to station failures
- Monthly reports and detailed quarterly reports of station performance metrics
- Proactive station monitoring and dispatch
- Coverage of labor for repairs typically not covered under a warranty such as vandalism, abuse, and accidents

### Smart Charging:

The Energy Commission should continue to prioritize networked charging stations for all funding programs. Investments in smart and networked charging

stations provide the greatest benefit to customers, including the ability to locate a station remotely and determine if it is currently in use, and will ensure future grid benefits such as managed charging are possible.

Manufacturing:

ChargePoint supports the Energy Commission's proposal in Chapter 6 to allocate \$5 million towards expanding in-state manufacturing capabilities for light-, medium-, and heavy-duty vehicle alternative vehicles, vehicle components, and refueling infrastructure manufacturing. ChargePoint appreciates CEC staff taking into account our previous comments supporting dedicated funding for light-duty vehicle infrastructure manufacturing. Once this Investment Plan is made final, ChargePoint encourages the Commission to release a timeline for the Manufacturing funding as soon as possible in order to allow plenty of lead time for companies to consider this opportunity and plan business activity and outside investments accordingly.

ChargePoint appreciates the opportunity to comment on the ARFVTP 2017-2018 Investment Plan Update and looks forward to a continued successful working relationship with the California Energy Commission.



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