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ChargePoint Comments 2018-2019 ARFVTP Investment Plan Update

Additional submitted attachment is included below.



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California Energy Commission
Docket #17-ALT-01
2018-2019 Investment Plan Update
Alternative and Renewable Fuel and Vehicle Technology Program

Public Comments
Submitted by
ChargePoint, Inc.
11/17/2017

ChargePoint appreciates the opportunity to provide written comments on the 2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP). This program provides funding opportunities that support and are complimentary to state energy policies and regulations, and also builds upon previous ARFVTP investment plans. 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. Now in its 10th year, ChargePoint is pleased to see the continuation of this program and the important investments being made in alternative fuel vehicles and supporting infrastructure to support the rapid and exciting changes occurring within the transportation sector.

I. Background

Headquartered in Campbell, California, ChargePoint is the world's largest and most open EV charging network with more than 42,500 level 2 and 650 DC fast charging spots, including more than 23,330 spots in California. Every 2 seconds,



a driver connects to a ChargePoint station and by initiating over 30 million charging sessions, ChargePoint drivers have driven over 716 million gas free miles.

II. Investment Plan Update Recommendations

Overall ChargePoint is very supportive of the Alternative and Renewable Fuel and Vehicle Technology Program Investment Plan Update for 2018-2019, and would like to thank the Energy Commission staff for putting together another impressive investment plan. ChargePoint supports the funding amounts, direction, and strategic objectives as it relates to EV charging infrastructure and manufacturing.

ChargePoint would like to comment and provide recommendations on four categories of the 2018–2019 Investment Plan Update to be considered by the Commission. Those categories are:

- Electric Charging Infrastructure
- Advanced Freight and Fleet Technologies
- Manufacturing for light-duty Vehicle Infrastructure
- Regional Alternative Fuel Readiness and Planning

Electric Charging Infrastructure:

ChargePoint is pleased with staff's proposal to allocate \$20 million for electric vehicle charging infrastructure. We feel that this level of funding is appropriate, and in conjunction with other funding sources will help to meet the goals in the ZEV Action Plan.

As identified in the Investment Plan, multifamily housing faces unique barriers that impede EV adoption. We strongly encourage the Commission to focus on serving this market with a program that provides generous rebates or incentives to cover a larger portion of both equipment and installation costs.

ChargePoint also supports the Commission's focus and commitment to addressing the barriers faced by low-income customers in adopting PEVs. Development of future funding opportunities should continue to focus on California's Disadvantaged Communities, and ChargePoint is very supportive of



Fresno County being the selected location of the first incentive project of the EV Infrastructure Block Grant Program.

We also believe that making funding available for the repair and upgrade of legacy chargers is a worthwhile effort. Legacy chargers that operate at low power levels, are unreliable, or have stopped working altogether, present an attractive opportunity for replacement at a reduced cost due to the electrical infrastructure already being in place. Also by allowing grant funds to be put towards purchasing maintenance plans lasting up to five years, station downtime will be minimized by ensuring that stations get repaired quickly in the event of equipment failure, damage or vandalism.

Close coordination is also needed with the California Air Resources Board (CARB) as it relates to 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.

Advanced Freight and Fleet Technologies:

ChargePoint is supportive of the Energy Commission's proposal to allocate \$17.5 million to this category. We support continued focus on retrofit and replacement of school buses with alternative fuel vehicles and supporting infrastructure, and targeting school districts operating the oldest school buses and those in disadvantaged communities. We are also supportive of the continued focus on California's ports, and projects that support the transition to zero-emission technologies as outlined in the Sustainable Freight Action Plan.

Within all categories but this one specifically, ChargePoint encourages that any investments in charging infrastructure be required to utilize standard connectors such as those used by light-duty vehicles. This will allow public light duty charging stations to be leveraged for medium and heavy duty vehicle needs, and ensure that charging infrastructure investments are not exclusive to a single vehicle OEM.

Manufacturing:

ChargePoint supports the Energy Commission's proposal 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.

Regional Alternative Fuel Readiness and Planning:

ChargePoint encourages the Energy Commission to provide any remaining funding that it has from this category for California communities to become EV-ready, since we feel there is still a need and demand. As electric vehicles continue to become mainstream, cities are looking for ways to incorporate EV infrastructure into city plans for transportation goals. Cities across the state are amending building codes to require that new buildings (including commercial, industrial, multifamily residential, as well as single and dual family housing) be constructed ready for EV charging infrastructure, beyond the requirements laid out in CALGreen. These EV-ready building codes help cities and towns achieve air pollution reduction, climate, and energy independence goals. Additionally, EV-ready policy helps to significantly reduce the cost of electric vehicle infrastructure installation.

ChargePoint appreciates the opportunity to comment on the ARFVTP 2018-2019 Investment Plan Update and looks forward to a continued successful working relationship with the California Energy Commission.

A handwritten signature in black ink that reads "Anne Smart". The signature is written in a cursive, flowing style.

Anne Smart
Vice President, Public Policy
ChargePoint