

## DOCKETED

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**ChargePoint Comments on ARFVTP 2018-2019 Investment Plan Update**

*Additional submitted attachment is included below.*



ChargePoint, Inc.  
254 East Hacienda Avenue | Campbell, CA 95008 USA  
+1.408.841.4500 or US toll-free +1.877.370.3802

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.  
3/30/2018

ChargePoint appreciates the opportunity to provide comments on the 2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP), Second Revised Staff Report<sup>1</sup>. We are encouraged by the substantial increase from \$20M to \$134.5M for electric vehicle (EV) charging infrastructure. This increase will help achieve Governor Brown's Executive Order B-48-18 (Executive Order), which aims to curb carbon pollution from cars and trucks and boost the number of zero-emission vehicles driven in California. We are confident the California Energy Commission (Commission) will develop programs that leverage private sector investment and support the Executive Order's goal to bring 250,000 EV charging stations to California by 2025.

ChargePoint is the leading electric vehicle (EV) charging network in the world, with charging solutions in every category EV drivers charge, at home, work, around town and on the road. With more than 47,000 independently owned public and semi-public charging spots and more than 8,000 customers (businesses, cities, agencies and service providers), ChargePoint is the only charging technology company on the market that

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<sup>1</sup> Revised 2018-2019 ARFVTP Investment Plan <http://energy.ca.gov/altfuels/2017-ALT-01/documents/>



designs, develops and manufactures hardware and software solutions across every use case. Leading EV hardware makers and other partners rely on the ChargePoint network to make charging station details available in mobile apps, online and in navigation systems for popular EVs. ChargePoint drivers have completed more than 31 million charging sessions, saving upwards of 34.9 million gallons of gasoline and driving more than 834 million gas-free miles. ChargePoint is poised to leverage its resources and best practices developed through previous ARFVTP charging station deployment and advanced vehicle technology manufacturing programs to support the Commission and the charging station deployment goals of the Executive Order.

### **Investment Plan Update Recommendations**

ChargePoint supports the ARFVTP update and commends Commission staff for another comprehensive 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 five categories of the 2018–2019 Investment Plan Update. Those categories are:

- ARFVTP Advisory Committee
- Funding Mechanisms
- ENERGY STAR
- Medium-and Heavy-Duty EV Charging Infrastructure
- Manufacturing for Light-Duty Vehicle Infrastructure

### **ARFVTP Advisory Committee:**

The EV charging industry is evolving rapidly. With the Executive Order’s ambitious goal to bring 250,000 EV charging stations to California by 2025, it will be important to align investment strategies with EV charging technology and market development. For this reason, we believe that a representative from the EV charging industry should be on the ARFVTP Advisory Committee. This representative would serve as a conduit for the industry to ensure programs leverage private sector investment, lower evolving barriers, and expedite charging station deployment. We recommend a vendor-neutral representative from the Electric Vehicle Charging Association (EVCA) to fulfill this critical role.

### Funding Mechanisms:

In order to achieve rapid deployment of charging stations, ChargePoint believes that the first-come, first-served approach of the California Electric Vehicle Incentive Project is the best mechanism for the majority of the \$134.5M. Competitive solicitations however may be appropriate for large coordinated deployments such as DC fast charging corridors, which require optimal spacing between locations and easy access from the highway.

### ENERGY STAR:

The requirement for ENERGY STAR certification for Level 2 charging stations in the Fresno County Incentive Project has received several comments submitted in favor and against the requirement. ChargePoint, which has received ENERGY STAR certification on all of our Level 2 products, strongly supports ENERGY STAR and this requirement. While some commenters have called into question the availability of testing facilities to perform the tests needed for certification and the future ENERGY STAR program, comments submitted by Peter Banwell of the Environmental Protection Agency<sup>2</sup>, which administers the ENERGY STAR program, state “both the House and Senate budget proposals make clear their intent for funding of the ENERGY STAR program to continue.” Mr. Banwell remarks, “The program is funded and operational, products are being certified on a daily basis, and the testing labs are providing services to program partners.” We are aware of multiple EV charging station manufacturers seeking certification which is supported by Mr. Banwell’s comment, “EPA has been in touch with several manufacturers regarding the status of their products in ENERGY STAR, and fully anticipates that there will be additional choices and models available in the near future.” ChargePoint commends the Commission’s leadership in requiring ENERGY STAR for Level 2 charging stations and anticipate the requirement will motivate the EV charging industry to strive for ENERGY STAR certification for their product offerings.

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

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<sup>2</sup> EPA future of ENERGY STAR comments  
[http://docketpublic.energy.ca.gov/PublicDocuments/17-EVI-01/TN222893\\_20180306T085358\\_Peter\\_Banwell\\_Comments\\_EPA\\_comments.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/17-EVI-01/TN222893_20180306T085358_Peter_Banwell_Comments_EPA_comments.pdf)

ChargePoint is supportive of ARFVTP funding allocations toward medium-and heavy-duty (MHD) vehicle charging infrastructure. We agree that there are special considerations required for these vehicles that may need to be addressed through its own program. Examples of potential program framework include the Advanced Freight Vehicle Infrastructure Deployment Grant Funding Opportunity (GFO-17-603) and MHD EV Block Grant. Echoing ChargePoint's last round of ARFVTP comments<sup>3</sup>, we encourage all investments in medium and heavy-duty charging infrastructure to be required to use standard connectors such as J1772, SAE Combo, and CHAdeMO. This will ensure charging infrastructure investments are not exclusive to a single vehicle OEM and mitigate stranded assets.

Manufacturing:

ChargePoint supports increased funding to expand in-state advanced vehicle technology manufacturing. ChargePoint appreciates CEC staff hearing 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 Investment Plan Update for the ARFVTP, Second Revised Staff Report, and looks forward to a continued successful working relationship with the Commission.



Anne Smart  
Vice President, Public Policy  
ChargePoint

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<sup>3</sup> ChargePoint 11/12/2017 ARFVTP Comments  
[http://docketpublic.energy.ca.gov/PublicDocuments/17-ALT-01/TN221825\\_20171117T152559\\_John\\_Schott\\_Comments\\_ChargePoint\\_Comments\\_20182019\\_ARFVTP\\_Inves.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/17-ALT-01/TN221825_20171117T152559_John_Schott_Comments_ChargePoint_Comments_20182019_ARFVTP_Inves.pdf)