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ChargePoint comments on the Southern California Incentive Project

Additional submitted attachment is included below.



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California Energy Commission
Docket #17-EVI-01
Southern California Incentive Project Under the Block Grant for Electric Vehicle Charger
Incentive Projects Throughout California
Alternative and Renewable Fuel and Vehicle Technology Program

Public Comments
Submitted by
ChargePoint, Inc.
4/27/2018

ChargePoint appreciates the opportunity to provide written comments on the proposed Southern California Incentive Project. ChargePoint would like to thank California Energy Commission (Commission) staff for designing a program that will expedite DC fast charger deployments in Southern California. We believe the program as proposed at the April 17, 2018 workshop provides a mechanism that accelerates charging station installations, reporting, and funding processes. The proposed program truly exemplifies the goals of CALeVIP and serves as a model for future charging station incentive programs.

We agree with the proposed funding allocations by county and minimum distributions to disadvantaged communities. We agree with the rebate amounts by installation equipment type. The emphasis on access to amenities for eligible site locations are appropriate for DC fast chargers and 24 hour a day access, 365 days a year is critical to promoting driver confidence and EV adoption. We also agree with the proposed equipment requirements and inclusion of a minimum 5 year networking agreement as an eligible expense. In an effort to make this well designed program even more effective, ChargePoint would like to provide the following recommendations

Recommendations

1. **Require at least 95% uptime for DC fast chargers.** This requirement is consistent with DC fast charging corridor programs GFO-15-601 and GFO-15-603 and is being replicated in other DC fast charging incentive program around the United States. In support of this minimum uptime requirement, we encourage

the Commission to allow extended warranty and maintenance packages as an eligible expense.

2. **Reduce minimum station requirements to one (1) DC fast charger for all site types.** There are multiple single connector DC fast chargers in the Southern California region, with only one DC fast charger on site. SCIP is well positioned to enable these locations to support all EV drivers by replacing them with dual connector DC fast chargers.
3. **Allow stub-outs for future DC fast chargers as an eligible expense.** Allowing stub-outs as an eligible expense will enable applicants to lay the foundation for sites to grow over time while minimizing future installation costs. This provision is consistent with DC fast charging corridor solicitations GFO-15-601 and GFO-15-603 and is being replicated in DC fast charging incentive programs around the United States.
4. **Maintain a simple, online application and rebate process leveraging the structure established in the Fresno County Incentive Project.** DC fast charger installations can be complex and require multiple parties to bring them to fruition. Overly complicated incentive programs may deter site hosts that lack the resources to navigate the process. Programs with multiple technologies and complex funding levels may work against CALeVIP's goal of expedited infrastructure deployment. ChargePoint believes the program as proposed is straightforward and easy for site hosts to comprehend. We encourage the Commission to maintain the proposed eligible technologies and funding structures.

Conclusion

Thank you for your consideration of ChargePoint's comments. ChargePoint looks forward to supporting the goals of the Commission and the Southern California Incentive Project.

Sincerely,



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