DOCKETED

Docket Number:	17-IEPR-07
Project Title:	Integrated Resource Planning
TN #:	217661
Document Title:	ChargePoint Comments on TE Guidance for POU IRPs
Description:	N/A
Filer:	System
Organization:	ChargePoint
Submitter Role:	Public
Submission Date:	5/19/2017 3:06:10 PM
Docketed Date:	5/19/2017

Comment Received From: Anne Smart
Submitted On: 5/19/2017
Docket Number: 17-IEPR-07

ChargePoint Comments on TE Guidance for POU IRPs

Additional submitted attachment is included below.

chargepoint.com

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
Dockets Office, MS-4
Re: Docket No. 17-IEPR-07
1516 Ninth Street
Sacramento, CA 95814-5512

May 19, 2017

RE: CHARGEPOINT COMMENTS ON THE TRANSPORTATION ELECTRIFICATION GUIDANCE FOR PUBLICLY OWNED UTILITIES' INTEGRATED RESOURCE PLANS

I. INTRODUCTION

ChargePoint respectfully submits these comments in regards to the *Transportation Electrification Guidance for Publicly Owned Utilities' Integrated Resource Plans* and the related Public Workshop on April 18, 2017.

ChargePoint is the largest electric vehicle (EV) charging network in the world, with charging solutions for every charging need and all the places EV drivers go: at home, work, around town and on the road. With more than 35,000 independently owned charging spots and more than 7,000 customers (including workplaces, cities, retailers, apartments, hospitals and fleets), ChargePoint is the only charging technology company on the market that designs, develops and manufactures hardware and software solutions across every category. Leading EV hardware makers, automakers 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 21 million charging sessions, saving upwards of 21 million gallons of gasoline and driving more than 525 million gas-free miles.

II. OVERVIEW

ChargePoint applauds the Energy Commission's staff for the development of the comprehensive guidance for the information, data and reports to be included in the Publicly Owned Utilities (POUs) Integrated Resource Plans (IRPs) related to transportation electrification. This guidance provides several critical recommendations that will ensure that the transportation electrification (TE) investments made by the POUs will support the state's goals regarding increasing EV adoption. Additionally, this guidance provides the framework for how these investments can be assessed and for the best practices and lessons learned to be shared with stakeholders.

ChargePoint suggests that four additional recommendations, or modifications to existing recommendations, be included in the Commission's guidance to the POUs. Our comments focus on the following proposed additional recommendations:

- A description for how the utilities' programs promote customer choice, competition, and innovation
- A description for how the utilities' programs will leverage credits from the Low Carbon Fuel Standard (LCFS) program
- A description of any proposed rate design modifications specific to demand charge rates for DC Fast Chargers (DCFC)

III. DISCUSSION

ChargePoint recommends that the guidance to the POUs also include a recommendation for the inclusion of a description within their IRPs for how any electrification investments in EV infrastructure broadly supports customer choice, competition, and innovation for the existing EV charging market in California. Specifically, the Commission's guidance should request that the POUs provide a description of the utilities' TE Programs' alignment with Section 740.12.(a)(1)(F) of the Public Utilities Code, as amended as part of SB350, which requires that:

> *"Widespread transportation electrification should stimulate innovation and competition, enable consumer options in charging equipment and services, attract private capital investments, and create high-quality jobs for Californians, where technologically feasible."*

This will ensure that the Commission will be able to accurately assess and track how these investments will impact the existing EV charging infrastructure market, as well as ensure that these programs are consistent with the legislative intent and goals of SB350.

Additionally, ChargePoint recommends that a description be required on how the TE Programs will seek to leverage or generate credits from the Low Carbon Fuel Standard (LCFS) program. There is precedent from POUs with TE Programs already underway to require recipients of rebates for charging stations to turn over their credits to the POU to collect. Since the revenue from those LCFS credits may be used to fund the TE Programs and could generate revenue well beyond the limited years of a pilot program, there should be some description provided as to how the POUs will use this credit revenue. ChargePoint believes that it may be appropriate for owners/operators of charging stations to generate LCFS credits themselves after the cost of utility rebate or incentive is recovered by the POU.

Finally, ChargePoint suggests that recommendation 2.(a). from the Guidance document be modified to include a specific recommendation relating to any planned changes to tariffs for DCFCs, including any modifications to demand charge rates for these chargers. The Guidance document already points to the importance to tracking the effect of rates and proposed barriers to transportation electrification. It has been well documented through various studies, including a recent report from Rocky Mountain Institute (RMI)[1], that traditional demand charges can be one of the most significant barriers to deployment of DCFCs. The POUs should include a description in their IRPs for how they plan to address this issue for their programs.

III. CONCLUSION

ChargePoint appreciates the opportunity to submit these comments and looks forward to continuing to work with the Energy Commission and other stakeholders in order to support the goals of SB350 and the widespread electrification of transportation.

Respectfully submitted,

Anne Smart

Anne Smart
Vice President, Public Policy
ChargePoint, Inc.
anne.smart@chargepoint.com

[1] RMI "EVgo Fleet and Tariff Analysis", April 2017. https://rmi.org/wp-content/uploads/2017/04/eLab_EVgo_Fleet_and_Tariff_Analysis_2017.pdf