

DOCKETED

Docket Number:	17-EVI-01
Project Title:	Block Grant for Electric Vehicle Charger Incentive Projects
TN #:	224972
Document Title:	EVgo comments
Description:	N/A
Filer:	System
Organization:	EVgo/Sara Rafalson
Submitter Role:	Public
Submission Date:	10/12/2018 1:48:11 PM
Docketed Date:	10/12/2018

Comment Received From: Sara Rafalson
Submitted On: 10/12/2018
Docket Number: 17-EVI-01

EVgo comments RE: Docket No. 17-EVI-01

Additional submitted attachment is included below.



11390 W. Olympic Blvd, Suite 250
Los Angeles, CA 90064

October 12th, 2018

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814 -5512

RE: Docket No. 17-EVI-01

To whom it may concern:

EVgo is grateful for the leadership of the California Energy Commission (CEC) in paving the way for the state to meet its ambitious transportation electrification goals. The work EVgo has done in partnership with CEC, the California Public Utilities Commission (CPUC), automakers, and other industry partners has led to our nation-leading public electric vehicle (EV) charging infrastructure enabling more Californians to access the benefits of EVs today. EVgo is leading the way for vehicle electrification across the state and the country, and more than 90% of Californians now live within 35 miles of an EVgo fast charging station. However, even more work and investment - building on what we have already done together - are needed to enable ubiquitous adoption of EVs in California. Access to robust public charging infrastructure will make the purchase of zero emission vehicles (ZEVs) an easier choice for Californians, which is why the California Electric Vehicle Infrastructure Project (CALeVIP) is such a critical program.

EVgo operates America's largest public EV fast charging network, with over 1050 chargers in 66 metropolitan markets. Primarily using DC fast chargers (DCFCs), EVgo fast charges more drivers for more miles than any public charging network in the nation. We provide over 100,000 monthly charges to 75,000+ EV drivers, powering EVs to drive over 5,000,000 miles monthly. Currently, we have nearly 600 fast chargers deployed in California with many more sites under construction and dozens more coming this year.

As cumulative California EV sales approach and surpass 500,000, and especially as more transportation networking companies (TNCs) shift vehicle miles traveled to clean electricity, public DCFC access is more important than ever. As such, in September, we announced that EVgo plans to grow its fast charger count in our top two markets, the San Francisco Bay Area the LA Metropolitan Area, by 59% and 45%, respectively, by year-end 2018. EVgo welcomes the opportunity to work closely with the state to expand that infrastructure to enable mass adoption of EVs, and we are expanding our infrastructure buildout to the varying geographies that the CalEVIP projects will cover. As the Commission finalizes its 2019 roadmap, EVgo respectfully offers the following suggestions:

1. **Add parks and private parking lots to the list of eligible sites.**

EVgo appreciates the thorough list of site locations that CEC staff has deemed eligible for CalEVIP, and we would suggest two additions. In addition to public parking garages, we would recommend private parking garages as well, which are common places for fast charging to be sited. The public can take full advantage of these locations, especially in densely populated areas where parking lots and garages are interested in new amenities to attract customers. Parks are another possible option, and EVgo is currently deploying charging infrastructure at a number of city parks.

2. **Provide flexibility for permission to operate deadlines.**

EVgo commends CEC staff for extending the permission to operate deadline from 12 to 15 months for fast chargers. EVgo has found that even with frequent and proactive communication between utility and third party EVSE providers, delays may (and often do) persist, leading to uncertainty in timelines between construction completion and electrification of charging stations.

We appreciate the flexibility in the draft program rules that suggest applicants communicate with Center for Sustainable Energy (CSE) staff if delays persist beyond the allowed 15 months. EVgo also respectfully recommends that CEC staff consider a PTO deadline of 18 months for fast chargers to leave space for

unanticipated delays that will occur, especially as utility staffing needs for electric vehicle interconnections and other related work are still being assessed and will need to be addressed as charging infrastructure deployments are expected to surge.

3. **Coordinate with other funding streams on timing of project launches.**

In its workshops, CEC staff encouraged applicants to “stack” CALeVIP funding with other available funding opportunities, which would have the effect of further stretching CEC dollars to more charging stations. EVgo is supportive of this approach and would recommend close coordination with air quality districts, utilities, and others that will soon launch their own funding opportunities for fast charging. Given how quickly funding has been allocated under the Southern California project, CEC coordination with these groups on timing will be critical for the possibility of any stacking across different incentives programs.

4. **Allow flexibility for DCFC sites in the case that they are unavailable to the public 24 hours a day.**

Given our experience installing charging stations in California at shopping centers, parking garages, city-owned locations, and the other site locations that CALeVIP deems eligible, we know that there would be unintended consequences with this requirement. Many optimal site locations - especially in prime retail locations which are ideal for DCFC given that EV drivers can charge their cars while running daily errands - restrict access to parking after midnight and before the site opens for retail business. As such, this requirement will have the unintended consequence of discouraging development at these prime locations, especially retail. While we share the intent and strive to have 24/7 availability of our DCFC locations, we would encourage the Commission to consider that to be a goal rather than a requirement.

Public-private partnerships like CALeVIP are critical to meeting the goals laid out by the Governor in his Executive Order, calling for five million ZEVs in California by 2030 and 250,000 electric vehicle chargers, including 10,000 direct current fast chargers, by 2025. EVgo thanks the Commission for the opportunity to provide input on this docket, and please do not hesitate to contact us if we can answer any additional questions or be of further assistance.

Sincerely,



Sara Rafalson, EVgo
Director, Market Development
Phone: (312) 909-1415
sara.rafalson@evgo.com