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**ChargePoint comments on the 2019 CALeVIP Projects Roadmap**

*Additional submitted attachment is included below.*



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California Energy Commission  
Docket #17-EVI-01  
2019 CALeVIP Projects Roadmap  
Alternative and Renewable Fuel and Vehicle Technology Program

Public Comments  
Submitted by  
ChargePoint, Inc.  
10/12/2018

ChargePoint appreciates the opportunity to provide written comments on the 2019 CALeVIP Projects Roadmap (Roadmap). ChargePoint commends the California Energy Commission (Commission) for its continued leadership in electric vehicle (EV) charging station incentive design. The Roadmap presents a series of projects that will accelerate California's deployment of EV charging stations, supporting Governor Brown's executive order calling for 250,000 charging stations in the state of California by 2025 and 5 million zero emission vehicles by 2030.

We applaud the Roadmap's alignment with the EV Projection Tool (EVI-Pro) to estimate how much infrastructure is needed to support electric vehicles in the target communities. The Roadmap's goal to support 50% of the required Level 2 charging stations and 30% of the DC fast chargers as defined by EVI-Pro, presents a scientific approach to incentive program design that should be replicated throughout the state. The proposed incentive levels and allocations are adequate to stimulate the market and will support a thriving and competitive EV charging ecosystem. We encourage the Commission to maintain CALeVIP's streamlined application process and the proposed funding levels to achieve the Roadmap's stated goals.

We also commend the Commission's ENERGY STAR requirement for Level 2 charging stations. When the Commission first conceived the requirement, there were no ENERGY STAR certified EV charging stations. Today, four EV charging station brands are ENERGY STAR certified and enrolled in the Fresno County Incentive Project with more to come. The Commission's leadership on this requirement has motivated EV charging station manufacturers to meet the ENERGY STAR requirements resulting in deployed infrastructure that uses 40% less energy when not charging an EV.

### Recommendations

1. **Coordinate with Authorities Having Jurisdiction (AHJ) on EV charging station permitting requirements.** The Roadmap presents generous incentives that will motivate a multitude site hosts to install EV charging stations. To help ensure installations are complete in a timely manner, straightforward permitting processes must be in place. We encourage the Commission to coordinate with AHJs in advance of project release dates to ensure permitting processes are streamlined to ensure EV charging station installations are complete as quickly as possible.
2. **Allow planning costs incurred up to six months prior to the landing page going live to count as eligible costs.** We appreciate the Commission's desire to allow planning costs incurred prior to funding being reserved to count as eligible costs. We believe this modification will increase the quantity of shovel ready projects available once a project is live. We encourage the Commission to extend this eligible cost period to six months prior to a landing page going live to support economies of scale. For example, if an applicant is installing charging stations in Sacramento County in November 2018 (i.e., three months prior to the release of the Sacramento County Incentive Project), it would be more cost effective for the applicant to begin planning new sites in Sacramento County concurrent with existing installations rather than designing new sites three months later. With numerous EV charging station projects currently under construction throughout the state, this minor modification may result in significant cost savings and ultimately more deployed infrastructure.
3. **Maintain a simple, online application and rebate process leveraging the structure established in the Fresno County Incentive Project and Southern California Incentive Project.** Complicated incentive programs with multiple technologies and complex funding levels may deter site hosts and work against CALeVIP's goal of expedited infrastructure deployment. ChargePoint believes CALeVIP is straightforward, easy for site hosts to comprehend, and stimulates the market. This is evidenced by the more than \$19 million requested by Southern California Incentive Project (SCIP) applicants in just five weeks of program launch. The early success of SCIP demonstrates the strength of the proposed incentives to stimulate the market and the effectiveness of charging station suppliers to reach ready and willing site hosts. We encourage the Commission to maintain the proposed approach, eligible technologies, and funding structures outlined in the Roadmap.

**Conclusion**

Thank you for your consideration of ChargePoint's comments. ChargePoint looks forward to supporting the goals of the Commission and the 2019 CALeVIP Projects Roadmap.

Sincerely,



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