

**DOCKETED**

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*Comment Received From: Cory Bullis*  
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**FLO Comments on CTP Investment Plan**

*Additional submitted attachment is included below.*



May 6, 2021

Ms. Patricia Monahan  
Commissioner, Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814  
Docket: 21-ALT-01

**Re: FLO Comments on the Draft 2021-2023 Clean Transportation Program Investment Plan**

Dear Commissioner Monahan,

Thank you for the opportunity to comment on the draft 2021-2023 Clean Transportation Program Investment Plan (Plan).

FLO is a leading North American charging network for electric vehicles (EV) and a major provider of smart charging software and equipment. FLO offers public, commercial, and residential chargers, including Level 2 EV supply equipment and DC fast chargers. In North America, FLO has deployed over 40,000 charging stations and manages approximately 500,000 unique charging experiences that transfer 5.5 GWH of energy monthly. FLO's headquarters and network operations are based in Québec City.

The Plan operates as an important roadmap that details the Commission's planned activities for its funding and implementation of the Clean Transportation Program. **As part of this roadmap, we respectfully encourage the Commission to integrate EV charging station reliability into its various activities.** There is a strong nexus between reliability and many of the analyses underpinning the Plan, yet the Plan makes no reference to station reliability. EV charging reliability relates to many of the Commission's planning activities, including:

- **Counting Chargers** – given the Commission's interest in tracking the state's progress to achieving the 2025 charging station deployment goal, reliability is an important additional progress metric to monitor. If the state fulfills the 2025 goal in terms of chargers deployed, but many of them become broken or are unreliable, FLO does not believe the state achieved the spirit of this target
- **SB 1000** – it is critical for the Commission to assess not only whether stations are equitably distributed, but also that they are maintained in an equitable way once deployed. Drivers should not experience a difference in accessing charging stations due to whether they have been well-maintained or not, no matter where they live or what network they use. This data would be a powerful tool to inform the overall quality of the state's publicly funded infrastructure and help improve equity outcomes for EV drivers.

**AB 2127 Infrastructure Assessment** – only networked charging stations can track reliability, enabling the site host to monitor if the charger is working properly in real time. Reliability data can help a site host understand how to improve their stations' overall performance, which only further supports EV driver access. This is yet another reason, in addition to the reasons outlined in the Commission's infrastructure assessment, why the state should invest in networked charging as much as possible.

**Given these considerations, we respectfully recommend the Commission begin tracking the reliability of publicly and ratepayer funded EV charging stations as soon as possible, as called for in the ZEV Market Development Strategy.** Should the Commission find in its assessment that some chargers are not well maintained, or that chargers have differing levels of reliability across networks or regions, we would respectfully encourage taking measured steps to remedy these differences and provide a high level of reliability to EV drivers, no matter their location in the state.

Thank you for your consideration,

*[Electronically submitted]*

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FLO