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FLO Comments on MDU & Rural Charging Grant Solicitations

Additional submitted attachment is included below.



July 13, 2021

Ms. Patricia Monahan
Commissioner, Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Docket: 20-TRAN-04

Re: FLO Comments on the MDU & Rural Charging Grant Concepts

Dear Commissioner Monahan,

Thank you for the opportunity to comment on the draft solicitation concepts for the Commission's multi-dwelling unit (MDU) and rural grants.

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 45,000 charging stations and manages hundreds of thousands unique charging experiences that transfer 5.5 GWH of energy monthly. FLO's headquarters and network operations are based in Québec City.

Multi-Dwelling Unit Grant

1. FLO recommends adjusting the 95 percent uptime “goal” to a firm requirement and increasing it to 97 percent.

FLO appreciates the Commission's recognition of the importance of uptime. However, the Commission's use of the term “goal” gives the impression that this is more aspirational than required. If so, it may lead site hosts or charging networks to not adequately prioritize station reliability, to the detriment of drivers. FLO encourages the Commission to develop projects from the perspective of drivers' needs – one aspect being that a higher charger uptime is critical to a positive consumer experience and increases consumer confidence in EVs. Furthermore, FLO believes 97 percent uptime, calculated on a 12-month rolling basis, is more in line with current industry capabilities and will ensure an even higher level of service to drivers. There are several examples of higher or mandatory uptime requirements appearing in various programs and recommendations across North America:

- The New York State Energy and Research Development Authority requires 97 percent uptime for its DCFC grant program¹.

¹ NYSEDA PON 4509, Page 11

- The Northeast States for Coordinated Air Use Management recommends a 99 percent uptime requirement for DCFCs².
- The Regional Electric Vehicle Plan for the West recommends a 97 percent uptime requirement for charging stations³.
- Multiple requests for proposals from private entities require 98 percent uptime for chargers they procure⁴.
- Sourcewell, which handles cooperative procurement for public entities, released a request for proposals earlier this year regarding charging stations, and asked respondents to describe any “performance standards or guarantees”, including uptime⁵.
- The City of West Vancouver requires an uptime of “95 percent or better” in its request for proposals for charging stations⁶.

2. FLO recommends adding a reporting requirement on the uptime of charging stations and requiring this reporting requirement for longer than 12 months.

As part of the Commission’s proposed reporting requirements, FLO recommends including uptime on a 12-month cycle. We believe this is critical to understanding the health of the chargers and the overall quality of the Commission’s investment. The state’s Zero-Emission Vehicle Market Development Strategy calls out the importance of tracking “charging system resilience” (page 17), and the Commission’s action plan commits it to “measur[ing] and track[ing] EV charging station reliability and uptime” (page 3). Furthermore, the Legislature just passed Senate Bill 129, which requires the Commission to track the downtime of stations funded with the money allocated in the legislation. Instituting a reporting requirement for uptime would ensure consistency in state ZEV planning documents and legislative requirements. Grants such as these present opportunities to begin a more robust process of tracking reliability. Other jurisdictions are doing this – for example, the Alaska Energy Authority’s request for qualifications on charging stations requires charging networks to “monitor station uptime” and provide this data to the agency⁷. Furthermore, it’s best to make sure uptime is reported consistently using a standardized reporting formula, which FLO is happy to provide additional technical support on⁸.

² Kinsey et. Al. *Building Reliable EV Charging Networks*. Page 6. May 2019.

³ REV West: Voluntary Minimum Standards. Page 3. [revwest_volminimumstandards.pdf \(naseo.org\)](https://www.naseo.org/revwest_volminimumstandards.pdf)

⁴ These two RFPs are currently live and are not publicly available, so we are not able to be more specific at this time.

⁵ Sourcewell. *Electric Vehicle Supply Equipment and Related Services*. April 2021.

<[Electric Vehicle Supply Equipment and Related Services | Sourcewell \(sourcewell-mn.gov\)](https://www.sourcewell-mn.gov/electric-vehicle-supply-equipment-and-related-services)>

⁶ City of West Vancouver. *Request for Proposals RFP21 012 Electric Vehicle Charging Infrastructure and Management Services*. July 2021. Page 7.

⁷ Alaska Energy Authority. *RFQ Section 2 EVSE Package Requirements Response Attachment A*. 2021. Pages A6-A7.

⁸ For more information on FLO’s standardized reliability formula, visit: [Reliability Blog Series #3: Calculating Standardized Charger Uptime \(flo.com\)](https://www.flo.com/blog/reliability-blog-series-3-calculating-standardized-charger-uptime)

3. FLO recommends requiring applicants to work with a community-based organization as a project partner.

Many MDUs are in dense geographies throughout the state, which typically have a greater number of community-based organizations (CBOs). Given the Commission’s focus on serving low-income and disadvantaged communities, FLO believes this grant is best served by requiring project applicants to work with CBO(s) to deliver projects that best fit targeted community needs. It is no longer sufficient to simply invest infrastructure in low-income and disadvantaged communities, but rather we all must proactively work in partnership with the communities to design and deliver projects that fit their needs. This process increases measurable and assured benefits to these groups because CBOs can provide valuable insights into the needs of these communities. Especially in denser and urban areas, there should be sufficient CBOs available for project applicants. Alternatively, the Commission consider given applicants additional points in its application if they partner with a CBO.

4. FLO recommends removing the reporting requirements on “type of vehicle that charged” and “number of unique vehicles”.

FLO recognizes the importance of reporting requirements to provide the Commission better insight into the characteristics of charging events. We have no objection to the collection of this kind of data. However, we believe that applicants who do not currently collect this type of data should not be disqualified from being awarded a grant. If potential applicants are disqualified on this alone, it has the potential to unnecessarily limit the number of applications and innovative projects that could be accomplished with this grant. It may also be tricky to report this information in a way that does not violate customers’ sensitivities around privacy of their information.

Rural Charging Grant

1. FLO recommends requiring chargers funded through this grant to adhere to a 97 percent uptime requirement.

The reasons stated above on this topic are especially acute in rural communities. Historically, stations are scarce in rural areas compared to MDUs, and drivers rely on stations for both traveling farther distances and for everyday needs. If drivers get stranded in rural areas due to broken chargers, it will significantly set back state efforts to increase consumer confidence and overall EV penetration.

Shaping driver’s perceptions positively on the reliability and convenience of charging infrastructure is critical to making EVs mainstream. Therefore, FLO respectfully recommends the Commission require 97 percent uptime, calculated on a 12-month rolling basis, for chargers deployed in rural areas.

2. For the same reasons above, FLO recommends adding a reporting requirement on the uptime of charging stations and to require this reporting requirement for longer than 12 months.

Thank you for your consideration,

[electronically submitted]

Cory Bullis
Senior Public Affairs Specialist – U.S.
FLO