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FLO Comments on 21-23 Investment Plan Update

Additional submitted attachment is included below.

September 30, 2021

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

Re: FLO Comments on the Updated 21-23 CTP Investment Plan

Dear Commissioner Monahan,

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

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 50,000 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 Quebec City.

FLO strongly supports the Update's acknowledgement that "access to convenient and **reliable** [emphasis added] zero-emission charging and fueling will be necessary to provide California drivers and businesses the confidence to adopt zero-emission vehicles" (page 9). Recognizing this, the Legislature, upon allocating a historic level of zero-emission vehicle infrastructure funding to the Commission via SB 129, requires reporting of "downtime" for all infrastructure it funds.

To ensure an accurate assessment of charging station reliability, FLO strongly recommends the Commission (1) develop a standardized reporting formula for all funding recipients to use[1] and (2) require funding recipients to report station uptime every 12 months for the useful life of the station (approximately ten years). Without a standardized formula, funding recipients could use varying methods to calculate station uptime, which will provide an inaccurate assessment of overall infrastructure reliability and undermine any assessments on the equitable access to reliable stations between communities. Furthermore, a station's equipment is most robust during its first couple years of operation; the Commission should require uptime reporting well into a station's useful life to understand how its performance changes over several years, especially for those stations exposed to the elements.

[1] FLO has a model uptime reporting formula here: Reliability Blog Series #3: Calculating Standardized Charger Uptime (flo.com)

These recommendations, while technical in nature, are critical to achieving a holistic, longer-term understanding of station reliability for the duration of useful station life.

Thank you for your consideration,

[electronically submitted]

Cory Bullis
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FLO