

DOCKETED

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**EVgo Comments on Southern California Level 2 Incentive Project
Public Workshop**

Additional submitted attachment is included below.

September 24, 2021

Ms. Patricia Monahan
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Docket 17-EVI-01 EVgo Comments on Southern California Level 2 Incentive Project Public Workshop

Dear Commissioner Monahan and Staff,

EVgo commends the California Energy Commission (CEC) for its leadership in helping the state meet its climate and zero emission vehicle (ZEV) goals through sustained investments in light duty charging infrastructure.

With more than 800 fast charging locations, EVgo's owned and operated charging network serves over 68 metropolitan areas across 35 states and more than 300,000 customer accounts. Headquartered in Los Angeles, EVgo's fast charging network includes over 300 fast charging locations in California.

EVgo thanks the CEC and CALeVIP program administrators Center for Sustainable Energy for hosting the recent public workshop on the Southern California Level 2 CALeVIP program, expected to launch in early 2022. During the workshop, staff proposed removing the long-standing TIN cap to the program's design. EVgo strongly supports the removal of the TIN cap and believes that this change would allow for program participants to scale deployment efforts and maximize the impact of the program in Southern California. There are a multitude of business models within the EV charging industry, and while each model engages with the site host in the deployment, the customer on record can look different for each model. As such, the removal of the TIN cap helps to promote business model neutrality.

EVgo applauds the proposed change and would recommend that the Commission replicates this change for program design parity in upcoming programs, including future DCFC solicitations such as the upcoming Alameda CALeVIP program. Extending the removal of the TIN ensures CEC is not favoring one business model over another in its program design while still enabling diversity in site host types, including small businesses, cities¹, mom and pop shops, grocery stores, retail centers, etc. Additionally, removing the TIN from DCFC programs would ensure that hosts can rely on the owner-operator model to locate chargers on their properties without needing to pay upfront to install chargers, which can be cost prohibitive for some host customers given significant expenses required to install and maintain DCFC.

EVgo thanks the CEC for the opportunity to comment and looks forward to being a partner to the CEC in pursuit of a fully electrified and equitable transportation sector. EVgo offers itself as a resource should any questions arise.

¹ In comment letters dated July 28th and 29th of 2020, the cities of San Mateo and Millbrae respectively filed in support of the San Mateo CALeVIP program and urged the Commission to increase the applicant cap, especially as they relate to DC Fast Charging applicants.

Best,



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