

DOCKETED

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ALT-21-01 2021-2022 Clean Transportation Program Investment Plan

Please see our attached comments.

Additional submitted attachment is included below.

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September 30, 2021

Ms. Patricia Monahan
California Energy Commission
Docket Unit, MS-4
Docket No. 21-ALT-01
715 P Street
Sacramento, CA 95814

Re: 21-ALT-01, 2021-2023 Investment Plan Update for Clean Transportation Program

Dear Commissioner Monahan,

ChargePoint appreciates the opportunity to provide comments on the California Energy Commission (CEC) Clean Transportation Plan (CTP) for 2021-2022.

Since 2007, ChargePoint has been committed to making it easy for businesses and drivers to go electric, with the largest electric vehicle (EV) charging network and most complete set of charging solutions. ChargePoint has enjoyed numerous partnerships with the CEC. Together we have helped accelerate EV charging deployment in rural communities, along highway corridors, at multifamily properties, workplaces, and publicly accessible locations. In addition, we have increased California-based EV charging manufacturing and supply chains and stimulated clean energy jobs throughout the state. ChargePoint continues to create the new fueling network to move all people and goods on electricity and looks forward to continued partnership with the CEC.

The CEC's CTP will continue to play critical role in supporting Governor Newsom's Executive Order, calling for 100% of new vehicle sales to be zero-emission within 15 years. We commend CEC staff for the efforts to engage stakeholders in developing the CTP plan and hope the comments below help inform this process.

Do the revised funding allocations in the latest version of the Investment Plan appropriately account for the availability of new General Fund monies? If not, what changes to the investment plan should the CEC consider?

ChargePoint recommends that funding for Light-Duty Electric Vehicle Charging Infrastructure should be increased. We appreciate the revision to the staff draft that increased funding from \$10.0 million in 2022-2023 to \$30.1 million, however we are concerned that \$13.8 million is not enough for 2023-2024 and encourage the CEC to increase that funding similar to 2022-2023 levels. The number of electric vehicle models available to consumers is expected to triple in the next couple of years, as the price of EV batteries continues to decline, thereby requiring the necessary EV charging infrastructure to support it.¹

Is the CEC appropriately balancing the needs and opportunities for ZEV infrastructure across the light-and medium-/heavy-duty sectors? If not what changes to the Investment Plan should the CEC consider?

ChargePoint supports the CEC's balancing across the light-and medium-/heavy duty sectors. Significant investments are needed to support fleet electrification as more medium and heavy-duty electric vehicles become available in the market.

Does the Investment Plan reflect the needs of low-income, disadvantaged or underrepresented Californians and California communities? If not, changes to what Investment Plan should the CEC consider?

ChargePoint is supportive of CEC's effort to allocate a minimum of 50% of the Investment Plan to benefit low-income and disadvantaged communities.

CEC's CTP funding decisions should consider prioritizing shorter drive times in areas of greatest need. CEC's 2021 analysis identified drive times for rural communities (up to 4 hours to a DC fast charging station, low-income communities (3 hours to nearest DCFC) and disadvantaged communities (1 hour to nearest DCFC) which is inadequate. Drive time maps can be used as starting point to identify the gaps in areas where "EV Infrastructure Deserts" currently exist.

Goal-focused partnerships are key to deployed charging stations in rural communities. ChargePoint has worked in partnership with the CEC to deploy charging station in rural communities. In multiple instances, ChargePoint formed regional and local partnerships that could only be formed while doing the real work at a local level. By requiring certain partnerships to be established upfront, creativity and innovation may be stifled over the course of the project. ChargePoint encourages the CEC to require program grant applicants to explain how they will achieve certain goals rather than requiring specific formal partnerships.

Thank you for your consideration.

¹ <https://www.utilitydive.com/news/electric-vehicle-models-expected-to-triple-in-4-years-as-declining-battery/592061/>

Sincerely,

A handwritten signature in black ink, appearing to read "Cesar Diaz". The signature is fluid and cursive, with the first name "Cesar" being more prominent than the last name "Diaz".

Cesar Diaz
Senior Manager, Public Policy
ChargePoint