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FLO Comments on the ZIP

Additional submitted attachment is included below.



February 3, 2022

California Energy Commission
Fuels and Transportation Division
1516 Ninth Street
Sacramento, CA 95814
Docket: 21-TRAN-03

Re: FLO Comments on the Zero-Emission Vehicle Infrastructure Plan

FLO appreciates the opportunity to comment on the development of the state’s Zero-Emission Vehicle Infrastructure Plan (ZEVIP). A comprehensive ZEVIP is critical to providing a more concrete, well-defined roadmap for California’s objectives to continue scaling deployment across the state. This can provide certainty to private industry on where to focus their deployment efforts as well as foster collaboration with stakeholders on key barriers the state needs to address to accelerate widespread electrification.

FLO Services USA Inc. (“FLO”) is a leading North American charging network for electric vehicles (EV) and manufactures smart charging software and equipment. FLO offers networked residential, workplace, public, and commercial chargers, including multiple power levels for both Level 2 stations and DC fast chargers. In North America, FLO has sold and deployed over 50,000 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 Quebec City, with additional offices across both Canada and the U.S.

I. FLO encourages the Commission to concretely define the ZEVIP’s principles around 3 pillars: EV charging market development, consumer protection, and equity.

EV Charging Market Development. FLO strongly supports the ZEVIP’s principled recognition of “the handoff” of this market to the private sector. We recommend expanding on this to specify that the Commission will achieve this “handoff” through (1) promotion of inclusivity for existing business models in incentive programs and policies, (2) encouraging innovation of new technologies, services, and business models and (3) streamlining incentive programs to expedite charging deployment. The industry remains nascent; it is rapidly evolving with new business models and technologies entering the market. The state’s multitude of policies, programs, and incentives must reflect this rapidly changing environment by not being overly preferential or limited to one kind of charging solution.

Equity. FLO also strongly supports the ZEVIP’s principled recognition of equity, building on the foundation to “lead with equity in all decisions” as noted in the Zero-Emission Vehicle Market Development Strategy. However, different groups define and measure equity differently; underserved communities and households are not a monolith. FLO encourages the Commission to concretely define equity and its principled outcomes within the ZEVIP. As part of this, FLO recommends the Commission specify the following focus areas to the over-arching principle of “equity” within the ZEVIP:

- Rural communities

- Multi-family housing
- Low-income and disadvantaged communities
- Ridesharing electrification
- Tribal governments
- Local governments in low-income, disadvantaged, and rural communities

Each of these segments have unique challenges and needs and therefore likely require varying policy tools to ensure delivery of robust charging infrastructure. The Commission has already made great strides targeting some of these segments with grants and rebates, but they need to remain a key focus of public investment and policy to accelerate transportation electrification.

Consumer Protection. Mainstream acceptance of EVs hinges on consumers' charging experience. Drivers want a charging experience that is cost-effective, convenient, appropriately fast, and reliable. Site hosts are increasingly viewing charging stations as an amenity or potential revenue source; therefore, they share many of these same values. The ZEVIP must embed consumer protection as a principle in all its policies and actions for this market and balance it accordingly with the co-equal goals of equity and market development.

II. The ZEVIP's actions must be well-defined, have a direct correlation to each of its respective principles, and specify a timeline for action.

To ensure coherency between the varying elements of the document, FLO encourages the Commission to directly specify ongoing and planned actions for each of its principles. This provides a more concrete "roadmap" for stakeholders to understand specifically how the Commission will accomplish each of its principles. As part of FLO's recommend principles above, we also suggest the following complementary actions for the Commission's consideration, including but not limited to:

EV Charging Market Development.

- Collaborate with the Public Utilities Commission (PUC) to create a policy framework that defines criteria for how utilities and transportation network companies (TNCs) should jointly invest in charging infrastructure for ridesharing vehicles. This will provide utilities more certainty through the review of their applications by the PUC and help leverage private capital from TNCs to scale the market.
- If funding recipients already intend to trench parking lots, ensure that incentive programs finance additional make-ready infrastructure installation to futureproof the site. This reduces future project costs as EV adoption scales and site hosts need to install more chargers.
- Create a rebate structure within CALeVIP that matches the varying cost structures of Level 2 curbside charging applications, which often vary in cost compared to more conventional Level 2 charger deployments. This has an added equity co-benefit, as curbside chargers are easier to deploy in various harder to serve areas, including for multi-family housing.

Equity.

- Ensure that 50 percent of all public funds across all state and utility incentive programs are dedicated to low-income and disadvantaged communities.
- Issue solicitations on an ongoing, cyclical basis for the Commission's CARTS, REACH and REV grant opportunities to promote innovative pilot charging projects for ridesharing, multi-family housing, and rural communities.

- Create new grant solicitations targeting tribal governments and local government fleet electrification in low-income, disadvantaged, and rural communities.
- As part of the design of CALeVIP 2.0, create dedicated investment targets for publicly accessible ridesharing infrastructure, multi-family housing, and rural communities.
- Direct utilities to rate base panel upgrades for households in low-income and disadvantaged communities; upgrading panels in old building stock is a financial barrier to low-income residents to adopt an EV, as it can cost anywhere from \$2,000 to \$4,500.
- Through the Commission's SB 1000 report, analyze the equitable access to reliable infrastructure to assess if lower-income communities are suffering from disparities in well-maintained stations.
- Conduct surveys, needs assessments, research, focus groups, and townhalls with each of the aforementioned segments to elicit feedback and insights on how to address their barriers to EV adoption and charger installation on an ongoing, cyclical basis.
- Collaborate with the Governor's Office of Business and Economic Development to continue developing various toolkits for under resourced governments to permit and install public chargers as well electrify their fleets.

Consumer Protection.

- Create a reliability standard for all publicly funded infrastructure by instituting station uptime guarantees and uptime reporting requirements for funding recipients. This will reduce consumer frustration with broken chargers and ensure charging companies are delivering the public benefit they promised in exchange for public funds.
- Through the Commission's AB 2127 Infrastructure Assessment, analyze the reliability of publicly funded infrastructure to understand its performance.
- Require and fund charger redundancy for all publicly funded installations, especially in rural communities and along corridors.
- Conduct surveys, research, focus groups, and townhalls with consumers and consumer groups to elicit feedback and insights on any outstanding consumer issues on an ongoing, cyclical basis.

The Commission's work creating a holistic zero-emission vehicle infrastructure master plan is critical to filling gaps in infrastructure and addressing historical inequities throughout the state. FLO does not intend for its recommendations for principles and actions to be exhaustive, but rather something to be refined on an ongoing basis as the Commission updates the ZEVIP periodically. We welcome the opportunity to partner with the Commission and other agencies to design and implement these recommendations, as they are paramount to rapidly scale this market in an equitable way.

Thank you for your consideration,

[electronically submitted]

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FLO