DOCKETED	
Docket Number:	19-AB-2127
Project Title:	Implementation of AB 2127 Electric Vehicle Charging Infrastructure Assessments
TN #:	242470
Document Title:	FLO Comments on EVI PRO 3 Analysis
Description:	N/A
Filer:	System
Organization:	FLO/Cory Bullis
Submitter Role:	Public
Submission Date:	3/25/2022 2:29:42 PM
Docketed Date:	3/25/2022

Comment Received From: Cory Bullis
Submitted On: 3/25/2022
Docket Number: 19-AB-2127

FLO Comments on EVI PRO 3 Analysis

Additional submitted attachment is included below.

March 25, 2022

Mr. Matt Alexander
Air Pollution Specialist
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Docket: 19-AB-2127

Re: FLO Comments on CEC's EV Infrastructure Projections 3 Model and Analysis

Dear Mr. Alexander,

Thank you for the opportunity to comment on the California Energy Commission's (Commission) Electric Vehicle Infrastructure Projections 3 model and analysis. FLO is a leading North American electric vehicle charging network operator and a provider of smart charging software and equipment. In conjunction with its parent company, AddEnergie, FLO leverages its vertical integration to offer EV drivers the best possible charging experience. Every month, the company enables more than half a million charging events, thanks to over 60,000 high-quality EV charging stations deployed at public, commercial and residential installations. FLO employees are located across North America, from the headquarters in Quebec City, to assembly plants in Shawinigan, to offices in Montreal, Vancouver and Sacramento, and we also work remotely in key US and Canadian markets.

I. FLO supports incorporating curbside charging into the EVI-PRO 3 analysis.

FLO strongly supports incorporating curbside chargers in the next iteration of this analysis –– as indicated in the workshop, curbside chargers provide an opportunity for public charging during the day, but just as important, they can also serve as an overnight home charging option at multi-family housing. To further inform how the Commission incorporates curbside charging into this analysis, we respectfully recommend:

1. Modeling curbside charging numbers at the county level. Cities have a central role in deploying curbside chargers in their public right-of-way, yet most cities lack the technical capacity and resources to know how many chargers they need to serve their multi-family housing residents. Projecting curbside charging needs at the county level may help encourage cities to proactively deploy more chargers because this data will provide more certainty to and justification for their procurements.

2. Differentiating curbside charging projections between Level 2 and Level 3 chargers. Level 2 chargers and DCFCs often serve different driver use cases – FLO believes providing this additional level of granularity in the model will help cities more appropriately right-size their procurements.

II. FLO recommends incorporating Level 2 chargers into infrastructure projections for ridesharing vehicles.

FLO appreciates the Commission's ongoing attention to ridesharing electrification through its WIRED model. Approximately 56% of U.S. ride-hailing drivers do not have access to home charging[1]. RMI notes the number of ride-hailing drivers in MDUs is likely greater than non-ride-hailing drivers[2]. The first iteration of the Commission's modeling only considered DCFC needs to serve ridesharing drivers; FLO recommends also incorporating Level 2 stations into these projections, similar to RMI's assessment of infrastructure needs for the greater LA region[3]. Level 2 stations can also play a role in serving ridesharing drivers, to their benefit –– they typical operate at reduced charging costs, which can be particularly helpful when drivers are charging their vehicles after a driving shift or over a break, help mitigate congestion at existing DCFC sites, and the state can stretch limited public funds by more cost-effectively deploying a mix of charging levels.

Given that the Commission initially projected DCFC needs to serve ridesharing drivers, as it incorporates Level 2 stations into its analysis, especially curbside Level 2 stations, FLO encourages the Commission to reassess overall DCFC infrastructure needs for ridesharing drivers. By incorporating Level 2 stations into the analysis, the original projected demand for DCFCs could be affected.

III. FLO recommends modeling load profiles specifically for 150 kW DCFCs deployed via federal funding over the next five years.

FLO supports the Commission's plans to model more robust DCFC power levels. As the Commission knows, the state will receive $384 million from the federal government of the next five years to deploy chargers along designated "alternative fuel corridors". The Federal Highway Administration requires these funds deploy a minimum of four 150 kW chargers per site along these corridors. Given this significant load impact to the grid, it would be extremely helpful to charging companies and site hosts alike to better understand which areas along California's highways have existing capacity to handle this level of load, and alternatively, which areas will likely need grid upgrades. This could help state, utilities, and charging companies accelerate implementation of federal funding by guiding optimal DCFC deployment.

Thank you for your consideration,

[*electronically submitted*]

Cory Bullis
Senior Public Affairs Specialist
FLO

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[1] Nicholas, M., Slowik, P., and Lutsey, N. *Charging Infrastructure to Support Electric Ride-hailing in U.S. Cities*. ICCT. March 2020. Page 6

[2] John Schroeder, Edward J. Klock-McCook, Shenshen Li, Ross McLane, and Dave Mullaney, *EV Charging for All: How Electrifying Ride-hailing Can Spur Investment in a More Equitable EV Charging Network*, RMI, 2021, **http://www.rmi.org/insight/EV-charging-for-all**. Page 14.

[3] John Schroeder, Edward J. Klock-McCook, Shenshen Li, Ross McLane, and Dave Mullaney, *EV Charging for All: How Electrifying Ride-hailing Can Spur Investment in a More Equitable EV Charging Network*, RMI, 2021, **http://www.rmi.org/insight/EV-charging-for-all**. Page 21.