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## California NEVI Plan Guidance

### *National Electric Vehicle Infrastructure (NEVI) Formula Program*

Founded in 2009, [Rivian Automotive, LLC](#) (“Rivian”) is an American manufacturer of all-electric adventure vehicles™ with production located in Normal, Illinois. With over 12,000 employees across the globe, Rivian designs, develops, manufactures, and distributes all electric, zero-emission pickups, sport utility vehicles (“SUVs”), and commercial delivery vans. In addition to vehicles, Rivian is also building out two complementary charging networks to support transportation electrification nationwide, the Rivian Waypoints Network and the Rivian Adventure Network.

As an all-electric automaker and an electric vehicle charging station network provider open to all EVs, Rivian has a unique perspective on how the development of state-level charging infrastructure plans can scale adoption of electric vehicles. This is particularly relevant as states develop their plans to administer National Electric Vehicle Infrastructure (NEVI) funds. Below is a list of key guiding principles we offer for consideration:

- **Consider the opportunities and challenges of rural charging infrastructure.**
  - Proactively engage with utilities to analyze grid capacity needs to meet NEVI requirements. Consider whether charging power levels above 150kW are technically and economically feasible.
  - To hit the 97% uptime required by NEVI guidance, it is critical that state plans include funding eligibility for operations and maintenance of stations, especially those located in harder to reach rural areas. Additionally, consider funding eligibility for installation of redundant infrastructure in addition to the minimum number of stations required by NEVI to aid in maintaining uptime.
  - Rural charging deployments are critical to meet the Justice40 goals by bringing benefits to rural, underserved communities through economic development. Consistent, reliable rural charging will increase confidence of all EV drivers and facilitate EV adoption overall.
- **Provide for flexible ownership and operation structures to leverage funding.** Flexibility will expand the availability of choice for charging infrastructure as providers offer options for site hosts.
- **Consider the forthcoming Discretionary Grant funding from the Joint Office when developing the state plan.** It is critical state DOTs coordinate with local governments to ensure a statewide buildout of EV-charging infrastructure achieves equitable and fair distribution among urban *and* rural areas. This includes factoring existing and upcoming supplemental funding sourcing into plan development.
- **Maintain neutral and flexible installation training programs.** Avoid installation requirements with the potential to delay or limit installations, including making installations contingent upon completing any one particular training program.
- **Require equitable, yet secure payment methods for charging transactions.** EMV chip, contactless via credit card or smart mobile phone and a toll-free number are the key technologies needed to enable convenient, secure and reliable transactions for EV drivers.
- **Communicate status updates of corridor build out and grid electrical capacity.** Estimate the completion timing of the state’s NEVI-compliant Alternative Fuel Corridors (AFCs). Provide annual status updates to stakeholders regarding the status of corridor completion and grid capacity along those corridors to inform deployment and product planning.

We welcome further discussions on these topics as California finalizes their charging infrastructure plans.

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