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ChargePoint Comments 21-TRAN-03_ CEC ZIP_20220513

Additional submitted attachment is included below.



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May 13, 2022

California Energy Commission
Re: Docket No. 21-TRAN-03
1516 Ninth Street Sacramento, CA 95814

Submitted to on-line portal:
<https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=21-TRAN-03>

Re: Docket Number 21-TRAN-03, Zero-Emission Vehicle Infrastructure Plan

ChargePoint appreciates the opportunity to provide comments on the California Energy Commission (CEC) Draft Zero-Emission Vehicle Infrastructure Plan (ZIP) and the State's commitment to "provide a pathway to success in zero-emission vehicle infrastructure deployment."

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. In pursuit of our goal, ChargePoint has enjoyed numerous partnerships with the CEC, and together we have helped accelerate EV charging deployment in rural communities, along highway corridors, and on multi-family properties. We have increased our 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 ZIP will play a critical role in ensuring that zero-emission vehicle infrastructure will meet the needs of the growing zero-emission vehicle market, presenting a pathway to success for California's zero-emission vehicle goals that includes increasing strategic investments from the private sector, utilities, and the public sector. We commend CEC staff for their efforts to engage stakeholders in developing the plan and hope the comments below help inform this process.

I. Charging for Medium- and Heavy-Duty Vehicles

ChargePoint supports a custom approach to address the diverse EV charging needs which the medium- and heavy-duty (MD/HD) sector require to convert to electric. We strongly support programs that provide distinct funding lanes, like those administered in CEC's recently funded Energy Infrastructure Incentives for Zero-Emission Commercial Vehicles (EnergIIIZE) program, where each lane is tailored to aid specific applications and unique funding processes. ChargePoint looks forward to continued engagement to ensure the EnergIIIZE program's success in providing infrastructure for MD/HD EVs.



ChargePoint strongly agrees that public and private funding will play an important role in the transition and will support the deployment of infrastructure throughout the state. In March 2022, ChargePoint announced a partnership with Goldman Sachs Renewable Power to offer a financed solution for fleet operators to prepare and transition their fleets to electric without the upfront costs and utilization risk typically associated with EV charging. The ChargePoint global fleet solution portfolio includes charging infrastructure and support with construction, installation, and maintenance all for a monthly fee.

II. Level 1 and Level 2 Charging for Light-Duty Plug-In Electric Vehicles

ChargePoint strongly supports CEC's initiative to focus investment on multi-family dwellings through incentive programs that include funding essential to effectively deploying chargers and infrastructure. ChargePoint considers multi-family homes to have some of the greatest need for funding, particularly those located in low-income and disadvantaged communities (DACs). ChargePoint also strongly supports the CEC's commitment to provide greater equity to DACs by providing financial assistance to install charging stations in multi-family homes. Prioritizing targeted programs, like CEC's Grant Solicitation, GFO-21-603 Reliable, Equitable, and Accessible Charging for multi-family Housing (REACH), which specifically addresses multi-family dwellings, helps ensure strong support of multi-family access to vehicle charging. ChargePoint encourages the CEC to continue to find efficient ways of providing charging opportunities for multi-family residents whether it be through enhanced incentives offered through CALeVIP or targeted programs like GFO-21-603.

ChargePoint supports efforts focused on providing charging at state facilities for fleets and employees. Beyond installing new, networked Level 2 chargers, we recommend the CEC upgrade existing stations and, where appropriate, replace existing charging stations with a mix of public Level 2 and upgrading to DCFC. This investment, combined with a 5-year maintenance plan, can help to improve reliability, and expand access. We support the CEC's goal to strategically install charging infrastructure at state-owned and leased facilities and urge the CEC to also include the University of California (UC), California State University (CSU), and community colleges in the deployment plan. ChargePoint believes that colleges would also commit through this investment to enable training, research, and workforce development.

III. Fast Charging for Light-Duty Plug-In Electric Vehicles

ChargePoint is encouraged by the Draft ZIP plan to deploy appropriated funding from the Infrastructure Investment and Jobs Act of 2021 for charging infrastructure, and strongly supports coordination between CalSTA, Caltrans, and the CEC on how appropriated funding will be spent. We also support complementary efforts to build upon prior investments and programs implemented by the CEC to build out a network of DCFC along California's designated corridors. However, we encourage the CEC to proceed with some of the possible concepts presented during the light-duty EV infrastructure allocation workshop held on December 2, 2021, and not wait for appropriated funding which may have its own set of unique requirements and limited flexibility. Such concepts that we encourage to proceed include grant funding opportunities for building out



additional corridors, fillings gaps, utilizing stub outs for expansion and drive-thru/parallel charging site configurations.

ChargePoint supports a varied approach to DCFC power levels, including 50 kW–150 kW for light-duty vehicles and up to 350 kW for MD/HD fleet charging, to serve diverse EV charging use cases and we strongly believe that it is critical to consider the grid impacts of DCFC. We encourage strategies such as power sharing among chargers and onsite batteries to be allowed, which can minimize overall site installation and operation cost as well as reducing the grid impact.

Thank you for your consideration of our comments. ChargePoint looks forward to continued collaboration with the CEC to accelerate the California's transportation electrification goals. Please do not hesitate to contact me at john.schott@chargepoint.com if you have any questions or if we can provide additional information.

Sincerely,

A handwritten signature in blue ink that reads "John Schott".

John Schott
Director, Grant Development
ChargePoint