

DOCKETED

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FLO Comments on CALeVIP Design

Additional submitted attachment is included below.



May 19, 2022

Mr. Brian Fauble
Energy Commission Specialist II
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Docket: 17-EVI-01

Re: FLO Comments on CEC's CALeVIP 2.0 Design Workshop

Dear Mr. Fauble,

Thank you for the opportunity to comment on the Energy Commission's California Electric Vehicle Infrastructure Project (CALeVIP) 2.0 design workshop. The Commission knows well how critical its work administering incentives, both grants and rebates, have been to the state's progress toward its EV charging deployment goals. FLO applauds the Commission's leadership and seeks to offer our support and technical guidance to inform your continued investments.

FLO is a leading North American EV charging network operator and a provider of 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. We support the Commission's proposed tiers for readiness.

To minimize speculative projects reserving too much funding and thus squeezing out other viable projects, we support the Commission's approach to institute tiers, each with an increasing set of documentation requirements. We believe this will not only encourage applicants to put together more thoughtful projects that are "shovel ready", but it will also encourage site hosts to take their commitment to installing charging stations more seriously. This can more quickly weed out site hosts who are not truly ready nor truly committed to installing charging stations. Furthermore, we support the randomization of applications once they are sorted into tiers as an equitable approach to processing them rather first come, first serve.

II. We recommend changing the "Issued Permit" requirement to "Proof of Filed Permit." For Tiers 1 and 2.

Despite measures taken in California taken to address permitting timelines – including AB 1236, AB 970, and the Governor's Office of Business and Economic Development's (GO-Biz) Permitting Guidebook – implementation of streamlined permitting has been widely uneven. Obtaining an issued permit may be difficult because of continued uneven permit streamlining and inadvertently further concentrate funding based on regions where permit approvals are quickest. Thus, FLO recommends the Commission instead require applicants to show proof that

they have filed their permit. Showing evidence of a filed application, along with the other requirements of site verification forms and final utility design sufficiently show the readiness of a site and applicant.

III. We recommend the Commission initially sets the application window for 45 days and then evaluates shortening the window over time.

Given that DCFCs are significantly higher in their power level compared to Level 2 stations, they can be significantly more complex to permit and get utility design applications approved for, especially if the local government is not as familiar with the technology. Because the Commission is piloting a new system for collecting and processing applications, with significantly increased documentation requirements, we encourage the Commission to have a 45-day application window to give applicants plenty of time to handle any back and forth with local governments and utilities to get their documents in order. This is likely to be an especially acute issue for charging companies that are in a startup or scale-up phase, in which they have less staffing capacity to quickly and efficiently interface with local entities to complete these documentation requirements. For comparison, Canada's rebate style program, the Zero Emission Vehicle Infrastructure Program, also use an approximate 90-day "window" to collect applications. We have found longer windows to be very helpful in giving applicants plenty of time to work out documentation requirements. After the Commission has completed a few windows of collecting and process applications, if it finds that it is receiving plenty of high quality (and thus higher tiered), complete applications from a diverse array of applicants, we believe it is appropriate to shorten the window. However, at the launch of the program, given that applicants will need time to familiarize themselves with this new system, more time will be useful.

IV. We recommend the Commission maintain a minimum DCFC power output of 50 kW (i.e. Option 2) to give site hosts the flexibility to right-size charging solutions based on drivers' needs.

Giving site hosts the option to choose the power level they prefer gives them more flexibility to right-size charging solutions and consider any associated tradeoffs in capital cost, site selection, and dwell time for drivers. If the Commission mandates high powered DCFCs (150 kW or more), it could have the negative consequence of excluding sites well-suited for charging, but which do not have the distribution capacity to support higher power levels. It also risks overbuilding infrastructure that is more costly and would pass off higher charging costs to drivers when a lower powered DCFC could have easily suited their needs. There is not a "one size fits all" solution to serving drivers, and while FLO will offer DCFCs 150 kW and higher, we do not believe the trade off in higher costs in exchange for faster charging speed will always be appropriate. Giving site hosts flexibility allows them to evaluate this. Reducing the number of viable sites and the potential number of chargers that could be deployed creates a missed opportunity to support all California drivers with adequate infrastructure and thus accelerate EV adoption. If the Commission still wishes to mandate higher DCFC power levels, we recommend first conducting cost benefit analyses to evaluate if this is necessary.

V. We recommend the Commission create four rebate tiers (50-99 kW, 100-199 kW, 200-299 kW, and 300 kW+) to carefully calibrate appropriate incentive amounts (i.e. Option 1 modified).

Creating these four rebate tiers will allow the Commission to design more nuanced rebate levels that more appropriately match the cost of each DCFC power level. The Commission can stretch

its dollars farther by not handing more money than is needed for a particular DCFC power level. For instance, if the Commission groups 50 kW- 150 kW DCFCs into one rebate tier, it may be providing too high of an incentive for 50 kW DCFCs if it bases the incentive level more toward a 150 kW DCFC. Alternatively, if it bases the incentive level more toward a 50 kW DCFC, it may not be appropriately supporting 150 kW DCFC build out for site hosts that want to choose this option.

VI. We recommend the Commission require uptime guarantees and uptime data reporting in exchange for CALeVIP 2.0 rebates.

We strongly support the Commission requiring CALeVIP 2.0 funded charging stations to adhere to a reliability standard via uptime guarantees. To encourage mass EV adoption, charging stations must be reliable. However, there are extensive examples of broken public chargers, causing consumer frustration. Plug In America, which represents EV drivers, released a survey in February that revealed 34 percent of surveyed drivers have experienced broken DC fast chargers, which was a “moderate concern” to them¹. The Air Resources Board also independently surveyed drivers about their charging experiences and found that the second most common customer complaint involved issues related to “charging station operability”². UC Berkeley conducted a study of the reliability of 657 DC fast chargers in the San Francisco Bay Area and found that only 72.5 percent were functional³. Of those DC fast chargers, 22.7 percent were non-operational due to unresponsive or unavailable screens, payment system failures, charge initiation failures, network failures, or broken connectors. Broken chargers, at best, risk creating consumer frustration with the EV charging experience, or, at worst, risk stranding them. To ensure charging stations are reliable, FLO strongly encourages the Commission to require that CALeVIP 2.0 funded charging stations meet a minimum of a 97 percent uptime guarantee at the individual station level for a minimum of five years, consistent with its EV charging grant solicitations for multi-family housing⁴ and rural communities⁵.

Thank you for your consideration,

[electronically submitted]

Cory Bullis
Senior Public Affairs Specialist
FLO

¹ Plug In America. *The Expanding EV Market: Observations in a year of growth*. February 2022. Page 2.

² California Air Resources Board. *Electric Vehicle Supply Equipment Standards Technology Review*. February 2022. Pages 10-11.

³ Rempel, D. *et al.* “Reliability of Open Public Electric Vehicle Direct Current Fast Chargers.” *Electrical Engineering and Systems Science*. submitted article. p. 1.

⁴ California Energy Commission. *EV Charging For Multi-Family Housing*. Page 16. November 2021.

⁵ California Energy Commission. *Rural Electric Vehicle Charging*. Page 16. December 2021.