DOCKETED	
Docket Number:	21-SOLAR-01
Project Title:	California Automated Permit Processing Program (CalAPP)
TN #:	243280
Document Title:	Tesla Comments CALeVIP Workshop
Description:	N/A
Filer:	System
Organization:	Tesla/Francesca Wahl
Submitter Role:	Public
Submission Date:	5/25/2022 9:12:28 AM
Docketed Date:	5/25/2022

Comment Received From: Francesca Wahl
Submitted On: 5/25/2022
Docket Number: 21-SOLAR-01

Tesla Comments CALeVIP Workshop

Additional submitted attachment is included below.

May 25, 2022

California Energy Commission
Re: Docket No: 17-EVI-01
1516 Ninth Street
Sacramento, CA 95814

RE: CALeVIP 2.0 Equipment Requirements and Program Design

Dear Commissioner Monahan and Energy Commission Staff:

Tesla appreciates the opportunity to provide feedback on the recent workshop hosted by the California Energy Commission (Energy Commission) on the proposed new eligibility requirements for the California Electric Vehicle Infrastructure Project (CALeVIP) 2.0 block grant that will focus on direct current fast charging (DCFC) and be administered by the Center for Sustainable Energy (CSE). The workshop also briefly introduced the Communities in Charge block grant programs that will focus on Level 2 charging and be administered by CALSTART. It is our understanding that more information will be shared on Communities in Charge program throughout the next several months. Tesla therefore focuses its comments herein on CALeVIP 2.0.

CALeVIP has been an important driver for investment in charging infrastructure across various regions in the state to help close the current infrastructure gap and help achieve the goal of 250,000 electric vehicle (EV) charging stations, including 10,000 fast chargers, by 2025. The revised CALeVIP 2.0 requirements not only modify the equipment eligibility criteria to include Open Charge Point Protocol (OCPP), ISO 15118 hardware ready, and EnergyStar certification but also restructure the previous first come, first served program framework, which ran into many implementation challenges, to be based on a tiered randomization approach.

Tesla is supportive of moving away from the first come, first served model and provides the following additional considerations for enabling CALeVIP 2.0 to be successful:

- Consider and incorporate: 1) whether there is compatibility between different versions of technical standards and 2) whether the short certification timeline is attainable given new versions of existing protocols are currently being released for the current timelines integrating new equipment eligibility criteria for OCPP and ISO 15118
- Re-evaluate the timeline and feasibility for requiring EnergyStar certification for DCFC as of July 1, 2023 given no DC equipment has currently completed the certification
- Consider modifying the requirement for having an issued permit versus a permit submitted for Tier 1 and Tier 2
- Focus on distributing funding by geographic regions for Project 1 and Project 2
- Set the minimum power out for DCFC at 150kW

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I. Provide Additional Time for Certification

For both new technical requirements for requiring equipment to be ISO 15118 hardware ready and supporting OCPP 1.6 or later, it is important to consider new versions of each protocol that have either recently been released or are currently in development. For instance, the availability of certification for OCPP 2.0.1 is not aligned with the current timeline of requiring this as a standard feature for the program by September 2022. For an EV charging provider that does not currently have its products certified to OCPP it would be most logical to support the latest version of OCPP 2.0.1. To our knowledge, OCA has not officially announced the timeline for the certification to be available for OCPP 2.0.1. It is important to not arbitrarily penalize an EV charging provider who wishes to pursue the latest version of OCPP but will likely not be able to meet the September 2022 timeline for completing certification. Therefore, we recommend staff either consider extending the timeline for compliance to 2023 to incorporate the forthcoming OCA certification timeline or provide temporary approval for demonstrating that an EV charging provider is in the process of obtaining certification for OCPP 2.0.1.

Additionally, the industry, including Tesla, has been engaged in developing the EnergyStar certification for DCFC, which is fundamentally different from AC charging, and has articulated many of the challenges it sees with applying this concept to fast charging. DCFC is not a consumer product that can be individually purchased like many other EnergyStar certified products and it will likely be more challenging for DCFC products to achieve certification. While we appreciate the EnergyStar requirement for Level 2 charging under the CALeVIP program has been in place for quite some time, this is not the case for DCFC and currently, it does not appear that there are any DC EnergyStar certified chargers on the EPA equipment list.[1] Therefore, additional time may be necessary for manufacturers to achieve DCFC EnergyStar certification and its applicability should be further evaluated by staff.

II. Consider Permitting Requirements

Incorporating a new framework for evaluating applications in CALeVIP 2.0 is important given the previous challenges with the first come, first served model. While a competitive solicitation process is generally preferred, we recognize the potential efficiency challenges with a competitive process for the potential volume of applications under CALeVIP 2.0. In general, we support project readiness requirements under the new process design for the selection methodology in order to prioritize those projects that are shovel ready. There is, however, additional evaluation needed whether requiring a final and approved permit, is actually achievable for Tier 1 and Tier 2 projects. We support EVgo's recommendation to focus on evidence of "filed permits" instead of relying just on issued permits. While much work has been done to streamline the permitting process for EV charging in California, more work remains and applicants should not be penalized or de-prioritized for having to navigate a more challenging permitting process in a jurisdiction.

III. Disburse Funding Based on Geographic Regions

[1] https://www.energystar.gov/productfinder/product/certified-evse/results

Of the three concepts presented at the workshop for distributing funds on a regional basis, the geographic region concept is most appropriate to align with the goals of distributing funds equitably and efficiently across CA. The other two concepts, degree of urbanization and need for DCFC, include challenges in the assumptions. For instance, need for DCFC should not solely be based on current available deployment of DCFC across the state but also be paired with EV registration data and expected uptake given there may be areas where there is congestion on the existing network that needs to be alleviated.

IV. Require a Minimum Power Output of 150kW

Using 150kW as the minimum power requirement for DCFC equipment in the program is appropriate. While DCFC power levels continue to increase, 150kW is now becoming more common and it is unnecessary to establish a higher power output requirement at this time. Tesla's Supercharger provides 250kW which allows drivers to recover a range of up to 200 miles in 15 min. In order to ensure that the program remains cost effective and given the EVs on the road today and in the next few years, it is important to not set a minimum requirement above 150kW at this time. At higher power levels, depending on vehicle state of charge, capabilities and other factors, there starts to be a tradeoff between the advantages of fast charging speeds, the cost and user experience. At the same time, the goal is not necessarily to replicate the gas station model as charging represents a fundamentally different customer experience.

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Tesla appreciates the opportunity to provide feedback on the proposed technical eligibility requirements and program structure. We look forward to continuing to work with stakeholders and staff as eligibility and requirements are refined and finalized for CALeVIP 2.0.

Sincerely,

Francesca Wahl
Senior Charging Policy Manager, Business Development and Public Policy