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Beam Comment Letter on CA Draft NEVI Plan

Additional submitted attachment is included below.

California Energy Commission
Dockets Office
1516 9th Street
Sacramento, CA 95814

RE: 2022 Draft NEVI Deployment Plan Development; Docket #22-EVI-03

BEAM is pleased to provide comments to the California Department of Transportation and the California Energy Commission's (the Agencies) Draft Deployment Plan for the National Electric Vehicle Infrastructure Program (NEVI). We thank the Agencies for their hard work and dedication to producing this draft for stakeholder input.

BEAM designs, manufactures, and sells sustainable EV charging infrastructure solutions that serve dual functions as emergency preparedness equipment and energy resiliency assets. BEAM systems are Made-in-America products that are manufactured in California. The flagship EV ARC™ charging system is the only 100% renewable, movable, grid independent, and it fits in a standard parking space. It requires no electrical work, no construction, and can be deployed in minutes.

After reviewing the Draft Deployment Plan for NEVI (Draft), we are supportive of the general vision and scope of the Draft. We offer the following stakeholder input on different elements of the Draft below:

1. We support the 150kW per port minimum, but we encourage the Agencies not to mandate output levels higher than the 150kW threshold. Requiring a threshold higher than 150kW would lock out potential NEVI sites that DO NOT have the appropriate grid capacity and create costly project overruns from upgrading grid capacity to meet the NEVI site's power output.

2. We understand the Agencies emphasis for including charging reliability in the Draft. Ensuring that EV drivers have a seamless and reliable charging experience is central to our company and to our charging solutions. However, we encourage further discussions with industry stakeholders to develop these specific reliability standards and what will need to be reported, and at what frequency they need to be submitted.

3. We appreciate the Agencies' acknowledgment that challenges come with the Electric Vehicle Infrastructure Training Program (EVITP). Safety is paramount in charging and to our company, but we need flexibility and options to ensure deployments are not stalled. EVITP is a relatively new statewide requirement, and with a large influx of federal and state dollars coming to charging, we need multiple solutions to ensure charging is deployed in a safe, equitable, and timely manner.

We also offer the following program design recommendations for consideration:

1. To guarantee continuity of charge and to foster resiliency and at California's NEVI sites, each site should have one charging port that is tied to a distributed energy resources (DER) or energy storage systems. FHWA's February guidance included DERs and energy storage as an option, but it was briefly mentioned in the draft plan.

   During many CEC workshops over the past year, many of the public comments have been centered around the need for resiliency and to ensure the continuity of the state's charging network, and we echo the same sentiment. More needs to be done to ensure the continuity of the state's charging network in event of grid disruptions from natural disasters, cybersecurity threats, and PSPS events. If at least one port per NEVI site is tied to a DER or energy storage system, we can start bringing charging continuity to the state and ensure drivers are not stranded.

2. We understand that FHWA has not released final language on exemptions, but they have released an Exemption Request Template that includes grid capacity, extraordinary costs, equity, and geography as a reason for case-by-case exemptions. There will be many locations in rural or grid constrained areas that will trigger the extraordinary cost exemption or the grid capacity exemption. When one of these two exemptions happens, or they both are triggered at a site, we request that site does not need a 150 kW per port threshold and can elect for lower kW outputs to complete a sites DCFC needs.

3. Allow Level 2 charging to be deployed in tandem with DCFC at NEVI locations. This will foster redundancy, meets the needs of different drivers, creates flexibility for the charging port provisions after the CCS requirement has been met, and helps reduce congestion at NEVI sites. During the June 14th Joint Workshop, staff was receptive to the concept, and expressed a potential interest in incorporating it into the final plan.

4. Develop a transparent scoring metric to send clear signals to companies on what the Agencies' NEVI project priorities are. This will provide certainty to companies on how to design NEVI projects. The scoring should factor in DERs and battery storage to foster resiliency, factors that reduce project deployment lead time, factors that can reduce costs like reducing construction time, and charging solutions that can be deployed at a predictable fixed cost so costly infrastructure upgrades are not required.

5. We support utilizing the CEC's previous contracting experience, but we request the implementation of preestablished funding windows to allow companies to have the appropriate time to prepare for the projects. Identifying the appropriate project partners takes significant human capital and lead time to achieve. There are many charging companies that vary in size and business model structure. Creating certainty in these funding windows will help smaller entities compete.

6. Release funds through multiple rounds and have administrators review the program guidelines based off of the learning from the previous funding rounds. This is a rapidly evolving nascent industry, and program design should be reviewed and revised regularly to ensure emerging technologies are not excluded from the program design. While the Agencies stated they would review program design in future years, we believe there needs to more than the 3 – 4 grant funding opportunities that are currently predicted.

7. While the Agencies have already stated they will be conducting research and holding workshops on the process for identifying electric vehicle charging service providers, we want to reemphasize the importance of this being an open and transparent process to all stakeholders involved. There are only a handful of owner/operator EVSE companies that have the capacity to operate at this scale, and we want to ensure that all business models have the chance to compete.

BEAM appreciates the opportunity to provide comments on the Draft and thank the Agencies for its ongoing work to advance the deployment of our nation's transportation electrification network. Please reach out if you have any questions.

Thanks,

Brad Groters

brad.groters@beamforall.com