DOCKETED	
Docket Number:	22-EVI-03
Project Title:	National Electric Vehicle Infrastructure Deployment Plan Development, 2022-26 for CEC and Caltrans
TN #:	243748
Document Title:	Livingston Energy Group Comments - Livingston Energy Group
Description:	N/A
Filer:	System
Organization:	Livingston Energy Group
Submitter Role:	Public
Submission Date:	6/28/2022 2:07:49 PM
Docketed Date:	6/28/2022

Comment Received From: Livingston Energy Group
Submitted On: 6/28/2022
Docket Number: 22-EVI-03

Livingston Energy Group

Additional submitted attachment is included below.

California Energy Commission
715 P Street
Sacramento, CA 95814

June 28th, 2022

RE: Public Comment on the National Electric Vehicle Infrastructure Deployment Plan Development, 2022-26 for CEC and Caltrans.

To Whom It May Concern:

Pursuant to the recent release of the National Electric Vehicle Infrastructure Deployment Plan Development, 2022-26 for CEC and Caltrans, Livingston Energy Group ("Livingston") respectfully submits the following comments for your consideration. Thank you for the opportunity to do so.

Founded in 2016, Livingston is a New York-based energy service and technology company, providing a full suite of services and equipment for the installation and management of electric vehicle ("EV") charging stations and the required power and supporting infrastructure. The company is actively working with utilities and government agencies to assist organizations including municipalities, universities, school districts, institutions, developers, and owners of commercial, industrial, and high-density residential properties with the adoption of more efficient technologies, including supporting EV infrastructure. So far, Livingston has successfully deployed over 1,000 Level 2 and DCFC charging stations in the US.
The EV stations we install can serve for both private and public charging, as well as fleet charging. In addition to the well-established charging station solutions currently offered, the company is actively committed to both hardware and software development, specifically aimed at improving both the station's property owner and driver's experiences. By incorporating various models of Level II AC and DCFC equipment with custom station management and e-mobility platforms, we are utilizing this unique position to pilot new equipment technology and software modules.

Livingston, through its Livingston Charge Port™ equipment and software solution, is dedicated to enabling the future of sustainable and cost-effective EV charging infrastructure and securing a robust EV charging network for all EV charging station owners, drivers, and stakeholders. We provide a variety of equipment accompanied by a warranty and a network solution, assisting customers in choosing the right equipment and ownership model for them.

We would like to express our support for the National Electric Vehicle Infrastructure Deployment Plan Development, 2022-26 for CEC and Caltrans. As most of the funding will be reserved for alternative fueling corridors, care should be taken when siting infrastructure to provide maximum benefit both to through-drivers and local communities. In particular, the size

Livingston Energy Group, LLC
2345 Maxon Rd. Ext. Suite 1
Schenectady, NY 12308

www.solution.energy
(518) 691-3073

and type of infrastructure should take into account both community needs and the local power sector infrastructure.

It is important to note that not all EVs are currently equipped for DC fast charging, therefore, we advise collocating Level 2 and DCFC stations.

To ensure that charging infrastructure is deployed in appropriate locations, we suggest the following site criteria:

- ***Convenience*** – When possible, the EV charging stations site should be selected within a half-mile of major transportation corridors where they can support both intra and inter-urban travel. When analyzing and selecting sites, the annual average daily traffic should be taken into consideration. To ensure that the EV charging stations are more attractive to drivers, we recommend trying to co-locate them with a host site that accommodates short-term visits, such as a coffee shop, convenience store, or similar. In addition, when possible, we suggest locating EV charging stations near a workplace where employees are likely to own EVs so that they can serve as a workplace charger in addition to providing access to the general public. Finally, take care to choose locations for EV charging infrastructure near multi-unit dwellings, allowing residents who do not have regular overnight charging opportunities to utilize the chargers.
- ***Visibility*** – We recommend selecting locations that are more visible to drivers and pedestrians, making the chargers more likely to be utilized and less likely to be vandalized.
- ***Proximity to Power Source*** – We take care that the locations we select are close to an existing transformer or panel with sufficient electrical capacity to allow for cost savings.
- ***Length of Parking Spaces*** – In parking lots where there is a difference in the length of parking spaces, longer parking spaces should be selected for the installation of the charging stations, allowing for greater room to fit a charging station while maintaining usability and limiting the risk of vehicle impact.
- ***Width of Parking Spaces*** – When possible, we recommend installing the charging stations in wider parking spaces in order to make sure that we decrease the risk of a cord being damaged if it lies to the side of the vehicle (plugged in or otherwise) provide space for proper operation of the charging station and ensure better access for the driver to reach the charging port if the port is located on the side of the vehicle.
- ***Lighting*** – We recommend ensuring that the parking spaces are well-lit, which can reduce the risk of tripping and the risk of damage to the charging station from vehicle impact or vandalism. Additionally, lighting will aid in the operation of the charging station, including plugging the vehicle in.

In many locations, new charging infrastructure will require major upgrades to local distribution networks and the high-voltage bulk transmission system. These upgrades can be mitigated through intentional approaches to reduce the impact of EV charging during times of high demand, including setting vehicle charging prices higher during demand periods to encourage charging during non-peak times and adopting smart charging technologies and programs that provide the opportunity for remote control over EV charging times and levels.

Prior to the deployment of charging infrastructure, communities should be involved in selecting charging station locations and be educated about EVs more generally. Communities along alternative fuel corridors, particularly those in rural locations, may not be familiar with the proposed infrastructure and may be reluctant to support its construction.

Finally, we would like to encourage the California Department of Transportation to consider cooperative purchasing programs in the procurement process. Traditional procurement is a lengthy and expensive process that can take months to complete. By contrast, cooperative purchasing programs, such as Sourcewell and the Interlocal Purchasing System meet all the bidding requirements and offer prequalified vendors and equipment that has a proven performance reputation in the industry.

We are confident that the California Department of Transportation together with the industry partners will be able to deliver reliable and equitable electric vehicle charging infrastructure for every EV driver in the State of California. Please feel free to contact us if you have any questions that we can answer based on our industry experience.

Thank you for the opportunity to offer our feedback.

Sincerely,

Dragana Thibault

Director of Government Affairs

Livingston Energy Group

Livingston Energy Group, LLC
2345 Maxon Rd. Ext. Suite 1
Schenectady, NY 12308

www.solution.energy
(518) 691-3073