

**DOCKETED**

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**ChargePoint Comments\_ 22-EVI-03 \_ NEVI Deployment Plan  
Development**

*Additional submitted attachment is included below.*



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June 28, 2022

California Energy Commission  
Docket Unit, MS-4  
Docket No. 22-EVI-03  
715 P Street Sacramento, California 95814

Submitted to on-line portal:

<https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=22-EVI-03>

**Re: Docket Number 22-EVI-03, National Electric Vehicle Infrastructure Deployment Plan Development, 2022-26 for CEC and Caltrans**

ChargePoint appreciates the opportunity to provide comments on the California State Electric Vehicle Infrastructure Deployment Plan and applauds the coordination between the California Energy Commission (CEC) and California Department of Transportation (Caltrans) on the strategic approach to develop and implement the California State Electric Vehicle Infrastructure Deployment Plan.

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.

As ChargePoint continues to create the new fueling network to move all people and goods on electricity, we look forward to continued collaboration and partnership with the CEC and Caltrans on the implementation of the California State Electric Vehicle Infrastructure Deployment Plan. We commend CEC and Caltrans staff for their efforts to engage stakeholders in developing the plan and hope the comments below help inform this process.

**I. Performance standards that meet National Electric Vehicle Infrastructure Formula Funding (NEVI) Program Requirements**

ChargePoint strongly encourages California to align with the Federal Highway Administration (FHWA) NEVI Program proposed minimum standards and requirements and allow applicants the flexibility to consider exceeding those minimum standards based on site specific considerations. Site specific considerations may include but not be limited to forecasted utilization, existing electric utility infrastructure, and site host options and availability of real estate.

ChargePoint recognizes that in addressing the diverse EV charging needs required to support the transition to electric vehicles, a varied approach to Direct Current fast chargers (DCFC) power



levels may be needed to serve a broad spectrum of EV charging use cases. ChargePoint encourages California to provide the flexibility for applicants to determine when to exceed NEVI Program minimum standards, such as appropriate power levels and number of DCFC ports, and not mandate anything greater than 150kW and four ports.

To protect the state's investment and ensure that sites are built to meet future vehicle needs and higher power levels, once supported through increased utilization, California should focus on future-proofing requirements that enable additional chargers to be installed with greater ease and lower costs. Sites should be designed with 350kW future charging speeds in mind which could incorporate the following future proofing considerations:

- Sites should have sufficient real estate or additional parking spaces to increase the number of DCFC in the future
- If pouring a new pad for the utility transformer, the pad to be upsized to support a larger transformer in the future
- Spare conduit should be housed in a pull box located near the switchboard
- Upsize the switchboard so that it can accommodate additional DCFC

Future proofing costs should be eligible for reimbursement and will help protect the state's investment by making it easier and less costly to upgrade sites when supported through increased utilization.

Providing flexibility, with respect to higher power charging and number of ports, can also provide individual site owners the ability to acquire, install, own, operate, and maintain NEVI sites. Promoting EV charging business model flexibility and innovative partnerships is important to maximize the pool of potential investment by the private sector, resulting in more competitive grant programs.

## **II. Reliability of the EVSE network and of stations**

ChargePoint strongly encourages the state to align with the FHWA NEVI Program minimum standards when developing mechanisms to ensure the reliability of publicly funded chargers. Aligning with the NEVI Program minimum standards would establish a consistent and clear approach across all states. Having uniform standards and mechanisms, such as using the same definitions and formulas, would support a transparent and well-defined program and help to prevent applicant confusion and need for additional technical support.

## **III. Strategies to Promote Strong Labor, Safety, Training, and Installation Standards**

ChargePoint commends California's plan to work with Electric Vehicle Supply Equipment workforce and labor partners, establishing a strong labor force of trained individuals, to support and enhance the industry. On June 9, 2022, ChargePoint announced a new partnership with the National Electrical Contractors Association (NECA) to accelerate the deployment of EV charging. Through the partnership, ChargePoint and NECA will develop training programs for its electrical



contractor members who install EV charging infrastructure. ChargePoint believes its partnership with NECA will make a positive impact to the electrical construction industry by leveraging NECA's network, digital marketing, social media, and communications platform to expand EV charging infrastructure.

Thank you for your consideration of our comments. ChargePoint looks forward to continued collaboration with the CEC and Caltrans to accelerate the California's transportation electrification goals. Please do not hesitate to contact me at [john.schott@chargepoint.com](mailto: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". The signature is written in a cursive style with a large initial "J" and "S".

John Schott  
Director, Grant Development  
ChargePoint