

**DOCKETED**

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*Comment Received From: Francesca Wahl  
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**Tesla Comments Draft CA NEVI Deployment Plan**

*Additional submitted attachment is included below.*

June 28, 2022

California Energy Commission and California Department of Transportation  
Docket Unit, MS-4  
Re: Docket No. 22-EVI-03  
715 P Street  
Sacramento, CA 95814

**RE: California's Draft Deployment Plan for the National Electric Vehicle Infrastructure Program**

Dear CEC and Caltrans Staff,

Tesla appreciates the opportunity to provide initial comments on California's Deployment Plan (draft plan) for the National Electric Vehicle Infrastructure (NEVI) Program and in response to the comments received at the workshop on June 14, 2022. California indicates that its initial deployment plan "will focus on investments in light-duty vehicle charging infrastructure and will consider projects that can also accommodate medium-and heavy-duty charging infrastructure."<sup>1</sup> Additionally, California intends to update the deployment plan annually to incorporate progress and identify additional challenges and opportunities.

In reviewing the draft plan, Tesla has identified several areas for further comment. Generally, we are supportive of utilizing a competitive grant solicitation process that does not identify specific sites for stations and that encourage applicants to "submit proposals for sites that meet performance standards for each segment"<sup>2</sup> as articulated in the draft plan. Building on this, it will be helpful for the CEC and Caltrans to issue transparent scoring criteria that will be utilized to evaluate the applications including cost effectiveness, similar to what is done in other current state funding programs. Additionally, we are supportive of the draft plan's intent "to further advance permit streamlining efforts across the state."<sup>3</sup>

The draft plan further indicates that California may prioritize giving funding to jurisdiction that are fully streamlined or have started the streamlining process. We support the intent of this prioritization but would also like to better understand how CEC and Caltrans intends to effectively incorporate this in the solicitation process and scoring rubric. According to GO-Biz there are currently 203 jurisdictions that are streamlined (green), 123 in the streamlining process (yellow) and 214 that are not streamlined.<sup>4</sup> To accelerate streamlining across California, the scoring rubric could include additional points for streamlined or in process jurisdictions and balance that scoring with additional points for geographic diversity/needs and disadvantaged community (DAC) targets.

Ensuring charging station reliability is important and should be a priority for the program. The draft plan indicates applicants will be required to submit Operation and Maintenance (O&M) plans and "and to meet robust maintenance, recordkeeping, and reporting requirements."<sup>5</sup> We encourage the CEC and Caltrans to continue to work with the industry to identify best practices and clearly articulate the reliability criteria that must be met.

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<sup>1</sup> Draft Plan, p.5.

<sup>2</sup> Draft Plan, p.15.

<sup>3</sup> Draft plan p. 37.

<sup>4</sup> <https://business.ca.gov/industries/zero-emission-vehicles/plug-in-readiness/>

<sup>5</sup> *Id.*

There are several other issues that were raised during the workshop that are either not directly referenced in the plan or only include limited detail. First, the draft plan outlines data collection efforts currently underway at the CEC as well potential integration with the technical guidance and other organizations.<sup>6</sup> We encourage continued coordination with industry stakeholders on any additional data collection requirements and to clearly identify the need and planned use. Generally, it is important to clearly articulate why certain data is needed and what the end goal is for utilizing this data. Second, there was discussion regarding the need for providing at least one Level 2 charger on-site to ensure reliability and redundancy. While Level 2 charging access at long-dwell locations is vital to meeting California's charging goals, it is not necessary or useful to mandate Level 2 charging at all highway corridor sites funded under the program. Any requirements for having one Level 2 charger on-site should be carefully evaluated given site-specific characteristics, such as rural versus more urban locations, and should instead be factored into the scoring process for certain sites where it is logical given the local amenities and expected vehicle dwell times. Finally, to the extent feasible, California's plan should support the minimum guidance for capacity set by the NEVI program at 150kW for direct current fast chargers (DCFC). Higher powered chargers greater than 150kW should be allowed and enabled in the program, but on a competitive evaluation basis to ensure the optimal use of public infrastructure funding.

Tesla appreciates the opportunity to provide feedback on the initial draft plan and looks forward to continuing to engage in California's implementation of the NEVI program.

Sincerely,

Francesca Wahl  
Senior Charging Policy Manager  
Public Policy and Business Development

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<sup>6</sup> *Id.*