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May 25, 2022

Ms. Barby Valentine
Mr. Tony Dang
Director's Office of Sustainability
California Department of Transportation
1120 N Street
Sacramento, CA 95814

Re: FLO Comments on Caltrans NEVI Deployment Plan Survey

Dear Ms. Valentine and Mr. Dang,

Thank you for the opportunity to comment on the California Department of Transportation's (Caltrans) development of its National Electric Vehicle Initiative (NEVI) funds. We are pleased to offer our support and technical guidance to inform your investments, which will be critical to scaling the EV charging market in California.

FLO is a leading North American EV charging network operator and a provider of charging software and equipment. In conjunction with its parent company, AddEnergie, FLO leverages its vertical integration to offer EV drivers the best possible charging experience. Every month, the company enables more than half a million charging events, thanks to over 60,000 high-quality EV charging stations deployed at public, commercial and residential installations. FLO employees are located across North America, from the headquarters in Quebec City, to assembly plants in Shawinigan, to offices in Montreal, Vancouver and Sacramento, and we also work remotely in key US and Canadian markets.

I. We recommend considering regional travel in addition to long distance travel when deploying electric vehicle infrastructure.

President Biden made his intent with the NEVI funds clear: he wants a national network of 500,000 charging stations along highways by 2030 to "increase confidence for drivers that they will always have a charging option when they need it"¹. In other words, we need to install chargers everywhere drivers go – this kind of visibility will give them certainty and security that they will not be inconvenienced, or worst, potentially stranded, if there are no conveniently available public chargers. It is not uncommon for a driver to travel across a region or between regions in any given day or weekend for work or pleasure, especially when considering the regional leisure trips Californians take to the beach, lake, or mountains, or to visit family and friends. Therefore, we encourage Caltrans to incorporate regional travel in its deployment work so that drivers are well supported. We do not recommend Caltrans include local travel because if drivers are traveling locally, they likely can charge at work during the day or at home at the end of the day. Even if they do not, there are other state programs focused on filling gaps in local charging infrastructure needs. Rather than duplicate those efforts, we believe Caltrans' funds are better focused on regional and long-distance travel.

¹ [FACT SHEET: Biden Administration Advances Electric Vehicle Charging Infrastructure | The White House](#)

II. We recommend giving flexibility to site hosts to choose power levels above 150 kW, but not requiring it.

Giving site hosts the option to choose the power level they prefer gives them more flexibility to right-size charging solutions and consider any associated tradeoffs in capital cost, site selection, and dwell time for drivers. If Caltrans mandates even higher power levels for one or more DCFC ports, it could have a negative consequence of excluding sites well-suited for charging, but which do not have the distribution capacity to support higher power levels. It also risks overbuilding infrastructure that is more costly and would pass off higher charging costs to drivers when a 150 kW DCFC could have easily suited their needs. There is not a “one size fits all” solution to serving drivers, and while FLO will offer DCFCs with power levels higher than 150 kW (such as 350 kW), we do not believe the trade off in higher costs in exchange for faster charging speed will always be appropriate. Giving site hosts flexibility to choose allows them to evaluate this tradeoff. Reducing the number of viable sites and the potential number of chargers that could be deployed creates a missed opportunity to support all California drivers with adequate infrastructure and thus accelerate EV adoption.

Alternatively, if Caltrans wants to “future proof” infrastructure so that 150 kW DCFCs do not quickly become outdated, FLO recommends installing “make ready” infrastructure that can support up to 350 kW DCFCs at each site, as well as requiring installation of additional make ready infrastructure beyond what is needed to support 4 chargers to enable easier and less costly installation of more DCFCs in the future. As EV adoption grows, the state will likely need to supplement these sites along highways with additional chargers beyond the 4 initially installed. Should Caltrans still desire increasing DCFC power level requirements beyond 150 kW, we first encourage it to conduct a cost benefit analysis via a 3rd party to fully assess the tradeoffs noted above.

III. We recommend requiring proper lighting and restrooms as minimum amenities for each site and incentivizing locating next to additional amenities by awarding extra points on applications.

Drivers need a consistently safe and convenient experience, so we believe requiring chargers to be installed in areas with proper lighting and restrooms is an appropriate minimum standard. California has a long history of providing drivers’ access to restrooms at rest stops along its highways; EV charging should be no different in this case. While we understand Caltrans’ potential desire to site chargers in areas with additional amenities – food, drinks, shopping, etc. – we do not believe this should be mandated, as it may restrict the number of viable sites, especially in more rural counties. However, awarding applicants extra points if they deploy chargers next to other amenities, as listed above, would encourage outcomes Caltrans wants to see with deployment without overly restricting the site selection process.

IV. We recommend Caltrans’ priority be to fill in infrastructure gaps along highways with its first year of NEVI funding followed by building new infrastructure in both rural and disadvantaged communities.

Creating driver confidence in a “robust, convenient, and affordable network of public chargers”² requires filling in infrastructure gaps along our highways. Drivers need to know that wherever they go, there will be publicly available chargers. However, President Biden has also made it clear with his Justice 40 Initiative that 40 percent of benefits from these investments must

² [FACT SHEET: Biden Administration Advances Electric Vehicle Charging Infrastructure | The White House](#)

accrue to disadvantaged communities³. California has an extensive record through statute, regulation, and incentive program design of funneling direct investment to low-income households and disadvantaged communities⁴, upwards of 50 percent of funds in a program in some cases. Given that Caltrans has approximately \$76 million available to spend on EV charging in its first year of the NEVI program, there is plenty of funding available to release two or more solicitations focusing on (1) infrastructure gaps along highways and (2) rural and disadvantaged communities. It should allocate 50 percent of first year funds to rural and disadvantaged communities, consistent with policies in other incentive programs. There does not need to be a tradeoff between serving broader EV charging deployment needs and rectifying longstanding, historical disinvestment in low-income areas. Therefore, we strongly encourage Caltrans to fund both goals concurrently as a 50/50 split.

Thank you for your consideration,

[electronically submitted]

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FLO

CC: Ms. Lori Pepper, California State Transportation Agency

³ [The Path to Achieving Justice](#)⁴⁰ | [The White House](#)

⁴ Some examples: The Legislature instituted income caps for EV rebates for the Air Board's Clean Vehicle Rebate Project; the Air Board also has an EV rebate program specifically for households in disadvantaged communities, called Clean Cars 4 All; the Energy Commission intends to invest 50 percent of its funds from the Clean Transportation Program to disadvantaged communities; [Assembly Bill 841](#) (Ting, 2019) requires utilities to spend 35 percent of their transportation electrification funds on underserved communities.