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California Electric Vehicle Infrastructure Deployment Plan

SparkCharge Comments

SparkCharge [https://www.sparkcharge.io/] welcomes the opportunity to provide comments to California's draft Electric Vehicle Charging Deployment Plan (the "Plan"). Stakeholder feedback is critical to ensure the plan for California's transportation electrification future is sustainable and equitable, and is responsive to the needs and values of California's diverse communities.

We encourage California to consider mobile charging as it develops its NEVI plan to be submitted to the U.S. Department of Transportation (DOT), which will empower local governments nationwide meet their EVSE goals effectively and expeditiously. Any NEVI program will only be effective if it permits innovative solutions that will assist states in the strategic deployment of EV charging infrastructure.

As such, SparkCharge recommends California deploy a program and contract mechanism to allow for the availability and funding for mobile charging, which may include procurement of equipment or vendors, partner agreements, or other mechanisms.

Introduction to SparkCharge & Portable EV Charging

SparkCharge has created the world's first mobile electric vehicle (EV) charging network, delivering charging directly to drivers regardless of where their EV is located. SparkCharge is committed to providing convenient charging for all. Portable units can deliver Level 3 direct current fast charging (DCFC) directly to drivers of EVs, regardless of where the consumer of their EV is located. As such, they will be essential in the transition to a new era in transportation.

SparkCharge created the Roadie Charging System ("Roadie"), a proprietary, portable, stackable, and modular direct current (DC) fast charger (DCFC). The Roadie recharges in as little as 4 hours from any traditional power outlet, with no need for additional equipment or installation. Further, the lightweight, modular batteries can be stacked for simultaneous use, which allows end-users to tailor the charging supplied to the range that is needed. These characteristics combine to help eliminate concerns around the presence and reliability of EV infrastructure.

> ***Proven Positive Community Impact.*** Roadies are a proven, deployable solution in both urban and rural areas, low- and moderate-income neighborhoods, and communities with a low ratio of private parking spaces to households or a high ratio of multi-unit dwellings to single family homes. Roadies are ready to be deployed broadly now, and it already serves nearly 90% of the lowest income zip codes in the markets where it has been deployed: San Francisco (100%), Los Angeles (88%), and Dallas (80%).
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> Access to charging will mean different things to different drivers. As popular as EVs are becoming, most Americans still see adoption as unrealistic; they live in multi-family units or in buildings where it is prohibitively expensive or simply prohibited to install an EV charging system where they park their car for the night. Only 3% of condo and apartment complexes in America

have chargers. Portable, mobile batteries can readily fill gaps in access to publicly accessible EV charging.

Solution for Emergency Preparedness and Resiliency. The increasing frequency and magnitude of extreme weather events as a result of climate chance necessitates a robust and resilient charging network to provide alternative fueling for EV owners. It is critical that California provides access to reliable DCFCs and innovative solutions during emergency events, including stranded motorists, major events, emergencies, storms, power outages, and other risks.

Mobile chargers, such as the **Roadie**, offer EV charging independent of the grid, offering resilience against grid outages. The Roadie can deliver power during emergency response or natural disaster situations. Compelling examples of the Roadie in action include:

- **Florida:** Following the 2017 storm season, Florida Department of Transportation's (FDOT) developed *Hurricane Irma's Effect on Florida's Fuel Distribution System and Recommended Improvements*, with several recommendations, such as mobile charging, included in this Plan. Responding to the need for EV charging during evacuation events, significant investments have been made by FDOT along these corridors to support safe and efficient mobility during emergency events. Today, the FDOT Road Runner fleet in Florida is using the Roadie to help charge abandoned EVs during extreme weather events.
- **New York:** The Roadie is used by triple AAA in western New York for emergencies. AAA WCNY's SparkCharge units can deliver electricity at a rate of one mile per minute of charge time.

SparkCharge Comments & Feedback to Inform EV Charging Deployment Planning

Mobile charging solutions will facilitate and expedite California ambitious EV charging deployment goals in both the long and short term. Mobile DCFC EV charging in California will complement the expansion of stationary DCFC charging throughout the state by adding a larger range for EV charging, and aiding those who do not necessarily live near or have access to EV charging in their daily lives. California draft NEVI plan's commitment to advancing publicly available EV charging on interstate highways near alternative fuel corridors (AFC), in urban and rural areas, and in underserved communities will be served by the deployment of portable, mobile batteries.

The Plan must promote transportation systems that increase mobility, provide accessibility, enhance California's communities and environment, and are safe and resilient. As such, the development and deployment of portable, mobile batteries and charging services is necessary. Because portable units can deliver EV charging directly to all drivers of electric vehicles – regardless of where the consumer or EV is located – they will be essential to the transition to a new era in transportation. Supplementing a stationary charging network with mobile charging options will improve the user experience, add

convenience, flexibility and peace of mind, facilitate equity in charging availability, and help remove a marketplace factor that has the potential to inhibit adoption of EVs by consumers and entities that manage motor vehicle fleets. This “all of the above” strategy for deploying DCFC is necessary to meet the demands of both the federal Bipartisan Infrastructure Law (BIL) statute and the market in [State].

Therefore, mobile charging should be explicitly included as an option for EV infrastructure deployment under the State’s Plan.