

DOCKETED

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Project Title:	National Electric Vehicle Infrastructure (NEVI) Funding Program
TN #:	246237
Document Title:	7-Eleven Comments - CA NEVI Program Pre-Solicitation Session 1 - Definition Experienced Charging Network Provider
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Organization:	7-Eleven
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Docket Number: 22-EVI-05*

**CA NEVI Program Pre-Solicitation Session 1 - Definition
Experienced Charging Network Provider**

Additional submitted attachment is included below.



7-Eleven, Inc.

September 27, 2022

California Energy Commission
Docket Unit, MS-4
Docket No. 22-EVI-05
715 P Street
Sacramento, California 9581

**RE: Comment on National Electric Vehicle Infrastructure Funding Program
Pre-Solicitation – Session 1**

7-Eleven thanks the California Energy Commission (CEC) and the California Department of Transportation (Caltrans) for the opportunity to provide comments on the pre-solicitation of the National Electric Vehicle Infrastructure Funding Program (NEVI) grant funding opportunity.

7-Eleven launched its 7Charge Electric Vehicle (EV) Network on June 9, 2022, and currently operates eleven direct current (DC) fast charges at seven 7-Eleven locations. 7Charge is a network of publicly available, non-proprietary EV DC fast chargers owned and operated by 7-Eleven at our stores. Powered by 100% green electricity, our chargers are located along often-traveled corridors, in well-lit, accessible store locations that are staffed 24 hours, 7 days a week by our friendly store personnel. 7-Eleven makes EV charging convenient and accessible. As we deploy 7Charge across North America, we aim to be the #1 choice for convenient EV charging!

7-Eleven, Inc. has reviewed the proposed application process for funding from the NEVI Program and offers the following comments:

Experience: 7-Eleven strongly encourages the California NEVI program definition of “experienced” Charging Network Provider to add **language requiring the private entity to have experience installing a minimum of 20 DC fast chargers at three or more locations in the United States and managing the completion of new construction projects in California**, removing the language requiring the private entity (or team member of the private entity) to have experience installing a minimum of 20 DC fast chargers at three or more locations, with three or more customers, in California.

The current definition of an “experienced” Charging Network Provider unfairly excludes the submittal of applications from private entities who operate an open protocol charging network, own the installation site, and manage the construction/installation of the charging equipment. While not defined in the slide deck referencing Eligible Applicants (slide #25), the term “experienced” Charging Network Provider was defined by CEC staff as a contractor with experience installing 20 DC fast chargers at three or more locations, with three or more partners, in the State of California since 2018. The strict definition to apply only to experience installing DC fast chargers in California is a barrier to entry for many qualified applicants with extensive experience in completing and managing new construction projects in California (including the install of DC fast chargers), and in installing DC fast chargers in the remaining continental United States. The experience gained from installing new construction projects outside of California is transferable to installing new DC fast chargers and should satisfy the CEC’s requirement for contractors to have experience with construction in California.

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Given 7-Eleven's expertise and experience constructing over 1,800 7-Eleven stores within the state of California to date; it is our position that our commitment to excellence in constructing our store portfolio in over 400 jurisdictions in California supersedes the experience requested from eligible applicants on slide #25. Our legacy to the commitment of our quality store construction mirrors our commitment to construct more 7Charge sites in California. 7-Eleven looks forward to your consideration of our previous efforts within the state as compliant to your request for eligible applicants given our breadth of experience.

Thank you for your consideration of 7-Eleven, Inc.'s comments. Should you have any questions regarding our comments, please contact Stacey Simms, EV Grant Program Manager, at 972-828-5595 or stacey.simms@7-11.com.

Sincerely,

Kristin Bennet

Kristin Bennett
Electric Vehicle Planning Manager
7-Eleven