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ChargePoint _ 22-EVI-05 NEVI

Additional submitted attachment is included below.



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California Energy Commission
Docket Unit, MS-4
Docket No. 22-EVI-05
715 P Street Sacramento, California 95814

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<https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=22-EVI-05>

National Electric Vehicle Infrastructure (NEVI) Funding Program

ChargePoint appreciates the opportunity to provide comments on the proposed structure, requirements, and eligibility for the National Electric Vehicle Infrastructure Funding Program (NEVI) grant funding opportunity as presented by The California Energy Commission (CEC) and the California Department of Transportation (Caltrans) during the Program Pre-Solicitation Joint Workshop earlier this month.

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 California and we commend CEC and Caltrans staff for their efforts to engage stakeholders and hope the comments below help inform this process.

I. Proposed Match Share

ChargePoint strongly supports the CEC's commitment to equity and understands that public and private funding will play an important role in deployment of infrastructure throughout the state. However, ChargePoint is concerned that the proposed match share design will not equitably serve a diverse and broad spectrum of applicants, site hosts, and investors. We strongly encourage California to consider a uniform approach to match share requirements and provide applicants the flexibility to determine when to exceed the Federal requirement of at least 20% match share, based on economics and site-specific considerations.

Providing flexibility, with respect to match share can encourage innovative partnerships and maximize the pool of potential private investment, resulting in more competitive grant programs. By enabling multiple ownership, operation, and maintenance models, the state's investment will be suited to attract cost share from a multitude of sources rather than a select few.

II. Proposed Criteria

ChargePoint understands that utilities will play a critical role in helping achieve California's NEVI strategy and will be faced with strict timelines and oversight requirements. ChargePoint encourages California to develop a common methodology to assess each applicants' utility readiness component, as required to meet the Project Implementation and Readiness criteria. ChargePoint recommends that California coordinate with the utilities to understand and establish a standardized process to use in evaluating project proposals. For example, similar to the Site Verification Form used for CALeVIP, the CEC could develop and provide a utility verification form to be filled out by applicants and the electric utility for each site. The form would document some degree of coordination and project readiness and could include fields clearly identifying which utility provides power to the specific site, if 3-phase power is available, and identifying any circuit capacity constraints. This utility verification form could be helpful in the proposal review and evaluation.

To assist with utility readiness, ChargePoint proposes that California provides utility points-of-contact (including name, email, and phone number) per region, on the docket website. Having this information readily available can help to provide efficient coordination and ensure that California utilities meet a sufficient level of engagement.

III. Category Points

ChargePoint reiterates its first recommendation that California modify its proposed match share, and strongly cautions against weighting the proposed scoring criteria's "Cost" with 100 possible points and recommends increasing the points allotted for "Project Location" "Project Benefits" or the other proposed scoring criteria.

Scoring in a way that allocates 50% of the total available points to the lowest cost proposal will favor only the well capitalized applicants and larger corporations. If the CEC is looking to encourage innovative partnerships and investment from small businesses and businesses within low-income and disadvantaged communities (LIC/DAC), we strongly recommend a rebalancing of the points. Instead of the lowest cost, CEC should focus on site location and projects that support CEC's commitment to diversity, which should go beyond just simply locating a project within a LIC/DAC.

IV. Total project cost estimate

Understanding that costs will vary per site, ChargePoint is concerned that placing a dollar cap, such as the proposed \$250,000 per charger, may create a financial constraint. This is especially true for sites in rural areas that lack the required electrical infrastructure, where costly upgrades may be needed and not covered under an Investor-Owned Utility program. Additionally, a \$250,000 cap would not cover the costs for onsite energy storage or renewables. We strongly encourage the CEC to provide applicants the flexibility to request reimbursement and match share that works for them, based on site specific considerations.



V. Groups

ChargePoint recommends Corridor Group # 6 Segment I-5: Sacramento to Santa Clarita be separated into two distinct corridor segments, with the I-5 segment (Sacramento to Kettleman City) remaining in the first solicitation under Corridor Group #6 (A), and the remaining I-5 segment (Kettleman City to Santa Clarita) to appear in the second solicitation as Corridor Group #6 (B). This proposed revised design, identified in the tables below, would help applicants focus on an appropriate number of new chargers and sites within I-5/SR41 (Kettleman City).

Revised Group 6 (A) for Solicitation 1

	Group Corridor Segments	Minimum # of New Charging Stations	Number of New Chargers	Required Sites
Group #6 (A)	I-5: Sacramento to Kettleman City	4	81	I-5/SR41 (Kettleman City)
	SR41: Paso Robles to Kettleman City	1	4	SR41/SR46 (Shandon)
	Total:	5	85	

Revised Group 6 (B) for Solicitation 2

	Group Corridor Segments	Minimum # of New Charging Stations	Number of New Chargers	Required Sites
Group #6 (B)	I-5: Kettleman City to Santa Clarita	3	81	
	Total:	3	81	

Thank you for your consideration of our comments. ChargePoint looks forward to continued collaboration to accelerate California's transportation electrification goals. Please do not hesitate to contact me at Margaret.larson@chargepoint.com if you have any questions or if we can provide additional information.

Sincerely,

Margaret Larson
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ChargePoint