

DOCKETED

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EVCA Comments on CA NEVI Pre-Solicitation Workshop

Additional submitted attachment is included below.



Electric Vehicle Charging Association

INNOVATION FOR CLEAN MOBILITY

September 28, 2022

California Department of Transportation
1120 N Street
Sacramento, CA 95814

California Energy Commission
715 P Street
Sacramento, CA 95814

Subject: EVCA Comments on National Electric Vehicle Infrastructure (NEVI) Funding Program Pre-Solicitation Workshop

To Whom it May Concern,

On behalf of the Electric Vehicle Charging Association (EVCA), I am writing to submit comments on the National Electric Vehicle Infrastructure Funding Program Pre-Solicitation Joint Workshop held on September 7, 2022.

EVCA is a not-for-profit trade organization of 19 leading EV charging industry member companies and two zero-emission autonomous fleet operators. It was established in 2015 to comprehensively represent the entire EV charging value chain and provide a collective voice for decision makers in California.

Firstly, EVCA is concerned about the requirement for eligible applicants to include “an experienced Charging Network Provider.” The proposed definition of “experienced” provided by the California Energy Commission (CEC) during the workshop is “*experience operating at least 20 DCFC connectors at a minimum of 3 sites in California since 2018.*” EVCA recommends that the restriction requiring applicants to be an “experienced” Charging Network Provider be deleted from the requirements of eligible applicants.

California should promote business model inclusivity in order to encourage EV and EV charging deployment efficiently and expeditiously. A requirement like this is unnecessary since applicants must already meet specific equipment and operational requirements which will ensure reliable infrastructure for consumers.

By requiring “an experienced Charging Network Provider,” the CEC and Caltrans will unnecessarily narrow the market of available EV charging providers, thus decreasing customer choice and market competition. This in turn will hamper innovation and detriment California consumers in the long run.

At a minimum, the CEC should consider striking the California requirement from their proposed definition of “experienced.” This unnecessarily restricts market participants with proven deployments in other U.S. or international markets.

Secondly, EVCA opposes the proposal to place corridors into groups and instead recommends that, like CALeVIP, the NEVI program seek to have one site per application. As such, rather than group multiple charger locations into one contract, applicants should be allowed to apply for funding on a site-by-site basis. No single property owner is likely to have properties that fulfill all of the real estate requirements being proposed in this solicitation, and thus, this requirement should be eliminated in favor of an application style more in line with other successful programs in the state.

Third, the cost share should be revisited, as 50% coverage will not be sufficient for more rural corridors where usage will be low.

Lastly, EVCA recommends the CEC consider aligning technical requirements, like OCPP and ISO 15118-ready, with other similar programs like CALeVIP. The solicitation requires equipment to meet OCPP 2.0.1 in order to apply but sufficient implementation time will be critical to scale the industry more quickly and provide more competitive projects. Additionally, the minimum technical guidance and standards from FHWA have yet to be finalized, with many EVSP providers expressing concern over the 2.0.1 version requirement. As FHWA may change their technical guidance to align with OCPP versions most commercially available today, EVCA recommends that CEC align itself with existing, proven programs of its own. Similarly, the NEVI program should be more explicit in incorporating a temperature check process previously outlined by the CEC.

Thank you for your consideration.

Sincerely,

Reed Addis
Governmental Affairs
Electric Vehicle Charging Association