DOCKETED	
Docket Number:	22-EVI-05
Project Title:	National Electric Vehicle Infrastructure (NEVI) Funding Program
TN #:	246253
Document Title:	EVgo CA NEVI Comments
Description:	N/A
Filer:	System
Organization:	EVgo
Submitter Role:	Public
Submission Date:	9/28/2022 3:37:37 PM
Docketed Date:	9/28/2022

Comment Received From: EVgo
Submitted On: 9/28/2022
Docket Number: 22-EVI-05

EVgo CA NEVI Comments

Additional submitted attachment is included below.

September 28, 2022

California Energy Commission
715 P Street
Sacramento, California 95814

Re: Docket No. 22-EVI-05 National Electric Vehicle Infrastructure Funding Program Pre-Solicitation Joint Workshop

California Energy Commission and California Department of Transportation Staff,

EVgo appreciates the opportunity to submit comments following the California Energy Commission (CEC) and California Department of Transportation (Caltrans) – hereby referred to as the "Joint Agencies" – pre-solicitation workshop regarding the National Electric Vehicle Infrastructure (NEVI) program. EVgo also applauds the U.S. Joint Office of Energy and Transportation's recent approval of California's NEVI plan and looks forward to supporting the continued development of electric vehicle (EV) fast charging infrastructure along California corridors.[1]

Founded in 2010, EVgo owns and operates the nation's largest network of public fast charging stations for EVs, with over 850 DC Fast Charging (DCFC) station locations and more than 1,000 Level 2 chargers across the U.S. EVgo's owned and operated network spans more than 60 metropolitan areas in more than 30 states. In addition to our twelve years of experience as an owner-operator of EV chargers, EVgo has been a first mover and a first learner in infrastructure program design by participating in numerous state infrastructure programs. Drawing on this experience, EVgo has compiled best practices in public funding program design, which are detailed in our Connect the Watts best practice guide.[2]

EVgo supports many elements of California's proposed NEVI program, which incorporates many best practices, including multiple funding rounds on a predictable, transparent schedule and many lessons learned from other infrastructure programs in the state on key program design elements such a project readiness. Below, EVgo offers several recommendations to strengthen the overall program design, mostly to ensure the program is aligned with other programs in the state such as CALeVIP.

EVgo appreciates the opportunity to provide feedback on the Joint Agencies' NEVI workshops and looks forward to continued engagement throughout the NEVI implementation process.

Respectfully Submitted,

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[1] https://content.govdelivery.com/accounts/CNRA/bulletins/32dd265
[2] https://site-assets.evgo.com/f/78437/x/3af075afc2/021622_nevi-best-practices-for-charging-infrastructure.pdf

General Feedback

I. Remove the grouping concept in favor of site-by-site application process in line with other best practice funding programs in the state, such as CALeVIP.

During its workshops, the Joint Agencies previewed a draft proposal that would bundle sections of eligible corridors into groups and require EVSPs to submit proposals that would satisfy the requirements for an entire corridor group. EVgo strongly advises against grouping multiple charger locations into a single contract or award for funding in favor of a process that allows for applicants to apply for funding on a site-by-site basis.

Moving to a site-by-site application would increase the likelihood of program success and also mirror other successful programs in California like CALeVIP, which does not require EVSPs to bundle sites for award. No single property owner is likely to have access to real estate that will meet all necessary requirements as drafted, which could jeopardize the success of the program. Alternatively, creating an open solicitation for individual stations will increase competition overall because a greater number of applicants will be well-positioned to apply for individual locations as opposed to entire bundles of locations.

If the Joint Agencies do move forward with rewarding applications with multiple sites per application, EVgo suggests mirroring options by the Washington Department of Transportation[3] whereby more locations along the corridors are awarded extra points in a solicitation, but being able to fully build a corridor or segment of the corridor is not a requirement.

II. Align many technical requirements with CALeVIP, including requiring Open Charge Point Protocol (OCPP) version 1.6 or later and supporting "temperature checks" for ISO 15118.

As drafted, the NEVI program would require OCPP 2.0. In CALeVIP 2.0, the state requires version 1.6 or later. EVgo recommends that the Joint Agencies change this requirement to align with CALeVIP. With the first NEVI solicitation scheduled to be released in Q1 2023, there is insufficient time to meet this technical requirement, which is not aligned with other state programs. Similarly, the Joint Agencies should implement the temperature check process for ISO 15118 that CEC shared with stakeholders in late 2021.[4]

III. Waive the requirement for additional make-ready infrastructure at a site if it has at least one 350kW charger.

The NEVI program, as drafted, would require at least 4 x 150kW chargers and at least 1 stub-out for future installation, which may vary by group. While EVgo understands the intent to encourage future-proofing, the reality is that applicants may apply for this program with 350kW chargers despite the 150kW floor. This is because 350kW chargers are in increasingly high demand by consumers and

[3] https://wsdot.wa.gov/business-wsdot/grants/zero-emission-vehicle-grants/zero-emission-vehicle-infrastructure-partnerships-grant

[4] https://www.energy.ca.gov/event/workshop/2021-11/iso-15118-charger-communications-and-interoperability-workshop

automakers alike.[5] As such, EVgo recommends that the requirement for stub-outs be waived if an applicant includes at least 1 X 350kW charger in the site design.

IV. EVgo recommends incorporating reliability metrics established through the stakeholder process required by AB 2061 (Ting).

EVgo supports the 97% uptime requirement, which is important for bolstering the consumer confidence necessary to drive EV adoption. EVgo recommends that the NEVI program use the uptime formula that will be established through the stakeholder process required by AB 2061 (Ting), as standardization of uptime across California programs is critical to their success. The NEVI program – and all California funding programs - will benefit from this stakeholder process and should not preempt it.

Also related to reliability, EVgo appreciates the explicit guidance that NEVI funding can be used to upgrade existing charging infrastructure at eligible sites, ensuring that higher power, reliable charging infrastructure can be developed to meet EV drivers' evolving needs.

V. EVgo recommends the Joint Agencies allow applicants to build "at risk" as has been done with CALeVIP.

EVgo encourages the Joint Agencies to clarify that applicants can receive NEVI program funding for eligible costs incurred at their own financial risk prior to award. In other words, if an application receives an award, those expenses should be reimbursable. Policies that prohibit or disallow reimbursement for work undertaken prior to final contract signature can significantly delay project development – sometimes up to 12 months. Building at risk will be a particularly important provision in the NEVI program, as the NEVI guidance sets a goal of completing EV supply equipment (EVSE) projects no later than six months from procurement. This again has been done with CALeVIP and is a best practice that helps support the timely achievement of California's EVSE deployment goals.[6]

VI. EVgo supports efforts to support project readiness and seeks clarification on the release of more specific application requirements.

EVgo appreciates the incorporation of project readiness, including requiring preliminary site designs and utility coordination. These requirements align with the reforms included in CALeVIP 2.0 and will support the development of the most viable projects along California's corridors.

EVgo would recommend that the requirements for a full application be communicated well before the opening of the application period so that applicants are able to execute on any time-intensive requirements. EVgo further suggests to carefully consider any utility related asks. Asking utilities for generic letters of support tends to cause a significant burden on applicants as well as utilities while not advancing the sites readiness in a meaningful way.

[5] See "Planning for the Electric Future: Charging Station Attributes." Available at: https://www.autosinnovate.org/about/advocacy/Recommended%20Attributes%20for%20EV%20Charging%20Stations%2009DEC2021.pdf, p. 1.

[6] See Alameda County's CALeVIP, the most recent DCFC installation: https://calevip.org/incentive-project/alameda-county."All costs may be incurred…at your own risk prior to the date your funds are reserved (e.g., application may be determined ineligible, or funds may be unavailable at time of application)"