

DOCKETED

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September 28, 2022

Caltrans & California Energy Commission

Re: Docket No. 22-EVI-05

Re: Comments on NEVI Program Pre-Solicitation Joint Workshop (1 & 2)

Veloce Energy and Siemens (the “Joint Technology Providers”) file these comments on the “National Electric Vehicle Infrastructure Pre-Solicitation Joint Workshop” (“Workshop”) that Caltrans and California Energy Commission (“Agencies”) staff presented via two sessions on September 7 and 8, 2022.

Veloce Energy (Veloce) is a California-based provider of EV charging solutions, committed to accelerating the electrification of transportation through technology and business model innovation. Veloce’s solution supports modular and flexible charging infrastructure, with the intent to accelerate deployment, drive cost efficiencies, and provide resiliency.

Siemens has deployed charging stations across every state in the U.S. Siemens has made investments of more than \$250 million in the U.S. EV market in the past 6 months, including expansion of our Pomona, California (IBEW Local 1710) manufacturing site, which helps provide the electrical infrastructure technologies that support EV charging systems and other critical electrical infrastructure. Siemens also has a new manufacturing facility coming online later this year and is introducing a new Buy American-compliant AC charger this fall. These actions will help Siemens meet its commitment to build 1 million EV chargers for the U.S. over the next four years.

The Joint Technology Providers, while supporting the Agencies’ solicitation overall, submit the following comments to ensure that the final solicitation incorporates technologies and revisions in the application evaluation and award process so that there is a more competitive, fair, cost efficient, and grid-supporting deployment of charging infrastructure using NEVI funds along the designated Alternative Fuel Corridors (AFC).

1. Use of NEVI funds: Project Costs and Minimum Requirements

Ensuring the eligibility of Distributed Energy Resources (DERs) such as battery energy storage systems (BESS) under project costs signals the criticality of their role in in the deployment of charging infrastructure, especially since many potential sites along the AFCs will need power resiliency and reliability to ensure charging accessibility 24/7 and achieving 97% uptime.

In addition, DERs whether they be microgrids, BESS, or on-site solar/wind co-sited with BESS, drive cost efficiencies and faster time to deploy **by reducing or eliminating unnecessary utility distribution system upgrades and service interconnection inefficiencies**. Again, given the likely site locations, DERs could play a vital role as substitutes for utility service size constraints, thereby reducing utility-side project costs. For example, if a charging site needs 600kW of capacity to support the total connected load, and the service connection to that site can support only 300kW of load, the remaining 300kW can be provided through BESS and/or a combination of BESS with on-site generation such as solar.

In this context therefore, we recommend that the **minimum site power capacity requirement “of not less than 600 kW”**, (Page 30 of the California State Electric Vehicle Infrastructure Deployment Plan) be amended. More specifically, the NEVI guidelines specify that four chargers must be able to charge simultaneously. This requirement can be achieved with a site interconnection of less than 600 kW, provided energy storage is available on site – Veloce is working with several customers to address exactly this issue. This is particularly applicable in rural sections of the AFCs, where utility grid capacity is less robust, and can provide substantial cost savings on the interconnection both in front of and behind the meter. **Accordingly, we recommend that this minimum requirement be modified to allow BESS to be included in the definition of “site capacity.”**

2. Contracting Process: Applications and Awards

The Joint Technology Providers are a strong proponent of public funding being awarded via a competitive process, and our recommendations to ensure a fair process are as per below:

- a. Agencies need to state criteria for what an **“experienced”** charging network provider is -- this pertains to both how it defines “experienced” and “charging network provider”. In the interest of ensuring that this requirement ensures a level playing field, we recommend that this requirement not be limited to just *“charging network providers”*, and instead be open to **all technology providers** involved in the provision of **charging infrastructure broadly defined**.

In addition, diverse business models involved in provision of charging services, such as Charging as a Service operators (CaaS), should be encouraged, and the process should not be restricted to applications that include a traditional EV Service Provider (EVSP).

- b. The proposal to grant *“not more than 3 awards in each solicitation”* to a single applicant could technically work out to be more than 50% of the corridor groups, assuming five corridor groups per solicitation for a total of 20.

A single organization, on its own or in consortiums winning 50% of the total NEVI funding allocated to California is concerning given its inherent anti-competitiveness. Our recommendation is that **no applicant be awarded more than 20% of the total sites in each solicitation, and no more than 20% of the total NEVI funding for the state.**

- c. In this connection, we also wish to voice our support for the expressed intent in the Plan to be neutral in its approach on applications that intend to upgrade existing sites versus developing new sites. **The Agencies should ensure that any existing site that applies is not a recipient of prior public funding, because the previous funding would be subsidizing the application** – this approach will broaden the pool of applicants versus providing additional public funding to recipients who already received public funding.

3. Contracting Process: Application Evaluation and Scoring

To encourage new business models and deployment of DERs to prioritize project cost efficiencies, we recommend that the “possible points” against the “scoring criteria” **be revised as below**. Emphasis should be on how innovation and sustainability ideas are driving cost efficiencies in both capital expenditure and operating costs. For example, increased resiliency through the availability of BESS at a site should result in a higher score for Innovation and Sustainability for that application.

Workshop Session 1, Slide #42

Proposed Scoring Criteria	Possible Points
1. Project Location	30
2. Project Implementation and Readiness	30
3. Project Benefits	20
4. Team Experience and Qualifications	10
5. Innovation and Sustainability	10
6. Cost	100
Total Possible Points	200
Minimum Points to Pass (70%)	140

REVISED VERSION

Proposed Scoring Criteria	Possible Points
Project Location	10
Project Implementation and Readiness	20
Project Benefits	10
Team Experience and Qualifications	10
Innovation and Sustainability	50
Cost	100
Total Possible Points	200
Minimum Points to Pass (70%)	140

4. Communications protocols

The Joint Technology Providers are strong supporters of open standards and interoperability. For that reason, we support the inclusion of both OCPP and ISO 15118 as technology requirements. Regarding OCPP, the solicitation should require that the chargers be tested to the Open Charge Alliance standards and receive third party certification. The version of OCPP should not be required to be 2.0.1 at this time. Instead, it should be a minimum of 1.6, with a commitment to move to 2.0.1 by January 1, 2025. Version 1.6 is widely used in currently manufactured EVSEs, but 2.0.1 is used in very few. Thus, the market needs time to adjust. Many of the implementation details for 2.0.1 are also in flux. Finally, the solicitation should **require that OCPP be used for the link between the charger and the back-end cloud**, as opposed to a requirement that the charger be “capable” of using OCPP. Capability does not equal interoperability, because the EVSE manufacturer can refuse to connect the EVSE to another company’s back end or can impose commercially unreasonable terms to do so. Any OCPP compatibility claims need to be backed up by the manufacturer by providing evidence that the chargers have been and can be actually connected to a third party’s back-end system.

5. Phasing

The solicitations should allow for a phased implementation of the minimum required capacity of chargers, which is four 150 kW ports. To better manage costs at sites where the CEC projects low initial utilization, the project provider should have the option of installing the full make-ready equipment to handle the four 150 kW ports (plus the space, conduit, and stub-out for a 350 kW charger), but only installing two 150 kW ports initially. Under this option, the provider would be required to install the additional two 150 kW ports by the end of the NEVI funding period, i.e., November 2026. This option would reduce capital carrying costs, as well as operations and maintenance costs.

5. Minimum standards

The Joint Technology Providers support the Agencies’ expressed intent to treat as a floor the federal regulations ¹ that will set the minimum standards and requirements for projects funded by the NEVI Formula Program.

The Joint Technology Providers appreciates the opportunity to submit these comments.

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¹ Department of Transportation, Federal Highway Administration Docket No FHWA-2022-0008