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*Comment Received From: Matthew E Chen  
Submitted On: 9/28/2022  
Docket Number: 22-EVI-05*

**Blink Charging Comments on CA National Electric Vehicle Infrastructure (NEVI) Funding Program Pre-Solicitation Workshop**

Please see comments from Blink and its subsidiary SemaConnect attached.

*Additional submitted attachment is included below.*



September 28, 2022

California Department of Transportation  
1120 N Street  
Sacramento, CA 95814

California Energy Commission  
715 P Street  
Sacramento, CA 95814

**Re: Blink Charging Comments on National Electric Vehicle Infrastructure (NEVI) Funding Program Pre-Solicitation Workshop**

To Whom it May Concern,

On behalf of Blink Charging Co. and its subsidiary SemaConnect, I am writing to submit comments on California's National Electric Vehicle Infrastructure (NEVI) Funding Program Pre-Solicitation Joint Workshop held on September 7, 2022.

Blink Charging Co., a leader in electric vehicle (EV) charging equipment, has deployed over 51,000 charging ports across 25 countries (2,800 in California alone), many of which are networked EV charging stations, enabling EV drivers to easily charge at any of Blink's charging locations worldwide. Blink's principal line of products and services includes the Blink EV charging network ("Blink Network"), EV charging equipment, EV charging services, and the products and services of recent acquisitions, including SemaConnect, Blue Corner and BlueLA. The Blink Network uses proprietary, cloud-based software that operates, maintains, and tracks the EV charging stations connected to the network and the associated charging data. Blink Charging has over 300 employees in the United States with facilities in Tempe, Arizona; Los Angeles, California; Bowie, Maryland; and Miami Beach, Florida. Additionally, Blink works with a diverse group of suppliers and contractors supporting approximately 700 jobs nationwide.

Acknowledging the California Energy Commission and California Department of Transportation (Caltrans) NEVI program proposal that creates a new definition of proven Charging Network Providers, Blink is concerned that this could preclude established Charging Network Providers from participating in California's NEVI program. As proposed during the recent workshop, the definition is a provider with "experience operating at least 20 DCFC connectors at a minimum of 3 sites in California since 2018." We respectfully urge that this definition be modified to include an additional metric such as "experience operating at least 20 DCFC connectors at a minimum of 3 sites nationwide since 2018 or have deployed at least 1,000 Level 2 chargers nationwide; or



experience operating at least 20 DCFC connectors at a minimum of 3 sites in California since 2018 or have deployed 1,000 Level 2 chargers in California at the very least” in the requirements for eligible applicants from the electric vehicle supply equipment (EVSE) sector. The current definition limits an “experienced Charging Network Provider” in a way that restricts the number of qualified potential partners, some of which are leaders in the EV charging sector. To be clear, Blink is not opposed to minimum standards, but we believe that this definition should help to create a competitive pool of applicants to provide Californians with the best EV infrastructure products in the marketplace today.

We believe that the state of California and its residents, including EV drivers, will benefit from business model inclusivity. It will support the state’s ambitious and laudable goals of increasing EV adoption and deploying EVSE along California’s Alternative Fuel Corridors and within California communities to make charging accessible, affordable, and equitable. Of note, EVSE vendors already must adhere to the state’s specifications for reliability, operations, and maintenance.

Free and open competition will promote consumer choice in the expanding EV marketplace. Adopting an excessively narrow definition of “an experienced Charging Network Provider” and establishing that as a barrier to entry in California’s NEVI program deployment will unduly restrict the number of EV charging companies that can participate in building out the state’s EV infrastructure. This current standard would deprive Californians of the options they deserve. Adopting this definition also would give a competitive advantage to legacy providers that have not consistently demonstrated they can provide the level of reliability that EV drivers expect and which the proposed definition of “experienced Charging Network Provider” implies.

Finally, we concur with comments submitted by the Electric Vehicle Charging Association (EVCA) that the California Energy Commission consider aligning technical requirements, such as OCPP and ISO 15118-ready, with other similar programs like CALeVIP. Eligible equipment must meet OCPP 2.0.1 in order to apply, but sufficient implementation time is essential as the industry rapidly develops and potential projects increase in both size and scope across the state.

Thank you for your consideration.

Sincerely,

Matthew E. Chen  
Director, Government Affairs  
Blink Charging Company