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Additional submitted attachment is included below.



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October 25, 2022

California Energy Commission
Re: Docket No. 22-ALT-01
1516 Ninth Street Sacramento, CA 95814

Submitted to on-line portal:
<https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=22-ALT-01>

Re: 2022-2023 Investment Plan Update for the Clean Transportation Program

ChargePoint appreciates the opportunity to provide comments on the California Energy Commission (CEC) 2022–2023 Investment Plan Update for the Clean Transportation Program, which allocates historic funding for zero-emission vehicle (ZEV) infrastructure.

Since 2007, ChargePoint has been committed to making it easy for businesses and drivers to go electric with one of the largest electric vehicle (EV) charging networks and a comprehensive portfolio of charging solutions available today. 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. ChargePoint continues to create the new fueling network to move all people and goods on electricity and looks forward to continued partnership with the CEC.

ChargePoint congratulates the CEC on the fourteenth year of the Clean Transportation Program, an essential part in making California a leader in zero-emission transportation. We appreciate the CEC staff for their engagement efforts and hope the comments below help inform this process.

I. Funding Mechanisms

The Investment Plan includes a Description of Funding Mechanisms that references a new proposal to set up revolving loans through IBank (p. 18). Past attempts at establishing loan programs for charging infrastructure that were administered by other state agencies in California and outside of the state, were met with challenges due to program requirements and the availability of better financing options from the private sector, including charging as a service, which many companies including ChargePoint currently offer. One such program administered in California limited eligibility to small businesses, but unfortunately those businesses were not well positioned to receive funding since they didn't necessarily own the property at which the charging station would be located. As the CEC investigates this funding mechanism more, we encourage research into financing options that are already available from the private sector to ensure that a CEC financing mechanism is targeted to market segments that could not otherwise secure financing.



We respectfully recommend that CEC consider specific use cases that are more likely to benefit from the structure of a loan, such as fleet vehicle depots or warehouses.

II. Light-Duty Electric Vehicle Charging Infrastructure

ChargePoint appreciates the CEC's leadership in allocating \$30.1 million in Clean Transportation Program funding for light-duty electric vehicle charging infrastructure, along with the \$237.5 million allocated from the general fund. Investments in light duty charging infrastructure will continue to be important to enabling drivers to access charging across the state.

We strongly support CEC's initiative to focus investment on a variety of use cases including mixed access and multi-family dwellings. Most light duty charging occurs where drivers are parked the longest, including at home and at work, yet not everyone has access to charging at these locations. Investing in a mix of private and public infrastructure will help to fill gaps, particularly for multifamily, and in low-income and disadvantaged communities.

ChargePoint believes the marketplace for EV charging would benefit from greater transparency from CEC on planned grant funding opportunities (GFO) in 2023, which would better enable potential applicants to meet the ever-growing needs of the California EV market. We look forward to learning more regarding the focus areas for this funding, similar to how CARTS, REACH, REV and CHILL2 were communicated far in advance.

ChargePoint also encourages the CEC to consider allocating funding to upgrade or retrofit existing stations. This will help ensure chargers can serve the needs of newer vehicles and use cases as well as address new state requirements such as payment methods and interoperability.

III. Projects Located in Rural and Disadvantaged or Low-Income Communities

ChargePoint strongly supports the CEC's goal to increase participation and benefits to underrepresented communities from a diverse range of regions in implementing the Clean Transportation Program. California's rural, disadvantaged communities and low-income communities are critical to ensure charging infrastructure is available equitably. As identified in the 2022–2023 investment plan, *"charger deployments should be targeted toward the needs of the local community, built environment, and use case. This targeting means there is no one-size-fits-all charging solution."* ChargePoint respectfully recommends CEC to consider the unique requirements of these communities when developing programs and consider enabling extended timelines to secure project partnerships. Allowing more time to apply for and then complete the installation of these projects will enable funding recipients to successfully address the hardest to reach areas with the greatest potential impacts. ChargePoint also respectfully requests the CEC increase the funding levels and reduce the match requirements rural areas, which can encourage participation from small and local businesses within these communities.



IV. Expanded Installation of Signs

ChargePoint appreciates the CEC's efforts to increase the installation of physical indicator signs to help build consumer awareness of public EV charging stations. ChargePoint respectfully recommends the CEC to shift signage installation requirements from GFOs focused on EV infrastructure, and instead use separate GFOs to support the installation of EV charging signs along freeways and roadways.

V. Charging Infrastructure for Medium- and Heavy-Duty Vehicles

ChargePoint strongly supports the Investment Plan allocation of \$1.7 billion for medium and heavy-duty ZEV infrastructure. We strongly support programs that provide distinct funding lanes, like those administered in CEC's Energy Infrastructure Incentives for Zero-Emission Commercial Vehicles (EnergIIZE) program, where each lane is tailored to aid specific applications and unique funding processes.

ChargePoint understands that charging infrastructure planning for the medium- and heavy-duty sector requires close attention to the specific vehicle uses and environments, high-power charging demands, lack of consistency in charging connectors, and landlord-tenant relationships. With these considerations in mind, including time to garner support and conduct community engagement, ChargePoint strongly recommends the CEC extend the GFO response time from one month to three months for applications to apply to EnergIIZE Commercial Vehicles funding lanes.

VI. Utility Coordination

Over the past few years, the CEC, in partnership with GO-Biz, has been successful in using funding opportunities to encourage local jurisdictions to improve permitting processes for EV charging stations. It would be helpful to the industry if the CEC could next help with timelines for utility interconnections and assisting utilities with planning for utility-side infrastructure needs to support these CEC investments. Some utilities have reported lead times of more than a year to procure transformers necessary to support installation of higher-powered charging stations. This presents an opportunity for CEC to assist utilities in building up strategic reserves of distribution equipment to eliminate lead times. If earmarked specifically for EV charging deployments, a strategic distribution infrastructure reserve will dramatically accelerate deployment and support California's ambitious transportation electrification goals, particularly for medium- and heavy-duty vehicle fleets.

VII. Emerging Opportunities

The Proposed Investment Plan Allocations include \$97.3M for Emerging Opportunities over the next three years. ChargePoint strongly supports this allocation for emerging vehicle segments that are beginning to transition to zero-emission technologies, including aviation and marine vehicles.

In consideration of how to design these GFOs and any requirements for associated power levels, ChargePoint recommends flexibility. To best serve diverse use cases, a range of infrastructure



power levels are needed to meet the needs of a specific technology. In addition, the requirements placed on more advanced infrastructure investments, such as standards and energy usage, may not yet be appropriate for these emerging opportunities at this phase of their design.

Funding for Emerging Opportunities should also consider investments in multiple stages of developing these new products. To ensure that the emerging sectors are supported we strongly recommended the CEC include funding for product prototyping, demonstration/pilot projects across multiple sites, and interoperability testing.

We anticipate that definitions of emerging technologies, and the design of this funding allocation, may require further discussion and updates. It would be helpful if the CEC could plan to engage stakeholders with a workshop or comment opportunity specifically on emerging opportunities before releasing a GFO.

VIII. Conclusion

Thank you for your consideration of our comments. ChargePoint looks forward to continued collaboration with the CEC 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