

**DOCKETED**

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*Comment Received From: Matthew E. Chen  
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**Blink Charging Comments on 2022-2023 Investment Plan Update  
for the Clean Transportation Program**

Please see attached comments from Blink Charging and its subsidiary SemaConnect.

*Additional submitted attachment is included below.*



October 25, 2022

California Energy Commission  
715 P Street  
Sacramento, CA 95814

**Re: Docket No. 22-ALT-01 | Blink Charging Comments on California Energy Commission (CEC) 2022-2023 Investment Plan Update for the Clean Transportation Program**

Dear CEC Commissioners and Staff:

On behalf of Blink Charging Co. and its subsidiary SemaConnect, I am writing to submit comments on the California Energy Commission (CEC) Fiscal Year 2022-2023 Investment Plan Update for the Clean Transportation Program.

Blink Charging Co., a leader in electric vehicle (EV) charging equipment, has deployed over 51,000 charging ports across 25 countries (more than 10,000 in California alone), many of which are networked EV charging stations, enabling EV drivers to easily charge at any of Blink’s charging locations. 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.

Blink Charging Co. supports California’s zero emission vehicle (ZEV) policy goals. Californians remain the top buyers of electric vehicles in the United States, accounting for around 43 percent of domestic ZEV sales. Yet, as noted in the Revised Staff Report, the transportation sector still “accounts for roughly 50 percent of state greenhouse gas emissions when considering ‘upstream emissions’ from fuel production.” The CEC’s Clean Transportation Program is a crucial component of California’s policy mechanisms to reduce greenhouse gas emissions, improve air quality, and enhance public health.

**Blink Supports the Recommendations of the Revised Staff Report.** The California Energy Commission has proposed an important and timely funding plan for Fiscal Year 2022-2023. As recently reported by Politico, new state data show that electric vehicles now make up 17.7 percent of all new cars sold in California this year. This is more than double than just two years



ago. Furthermore, we acknowledge the CEC’s AB 2127 Electric Vehicle Charging Infrastructure Assessment (June 2021) which projects that by 2030 “California will need nearly 1.2 million public and shared-private chargers to support the roughly 8 million ZEVs that CARB projects in its Mobile Source Strategy. An additional 157,000 chargers are needed to support 180,000 medium- and heavy-duty vehicles anticipated for 2030.” Blink is committed to help close the gap from 2030 estimates of nearly 900,000 Level 2 chargers and more than 19,000 Direct Current Fast Chargers (DCFC) projected by the CEC (p. 7 of report/p. 20 of PDF).

**Light-Duty Infrastructure Essential for Today’s EV Market.** Charging infrastructure must scale quickly to meet the expanding market for light-duty EVs in California. While the federally funded National Electric Vehicle Infrastructure (NEVI) Formula Program will provide significant DC fast charging infrastructure along high-volume interstate highways, EV chargers closer to (and within) communities still are needed to ensure that EV drivers have access to affordable and reliable charging. As noted in the Revised Staff Report, “About 88 percent of urban communities are within 10 minutes of a public DC fast charger; in contrast, about 60 percent of rural communities are farther than 10 minutes away” (p. 44 of report/p. 57 of PDF). We welcome plans by CEC for a pre-solicitation workshop and docketed proceeding on funding opportunities for light-duty charging infrastructure that can serve (a) rural communities and (b) multifamily residents.

**Increase Funding for Medium- and Heavy-Duty Charging to Meet Future Demand.** While light-duty EV adoption in California is rapidly growing, Blink applauds the CEC for advancing the state’s equally noteworthy goals for electrifying the medium- and heavy-duty transportation sectors. As fleet vehicles often run much longer duty cycles than light-duty passenger vehicles, it would be advantageous to allocate additional funding only for battery electric vehicles in EnergiIZE Commercial Vehicles, whose funding is fully subscribed (p. 54 of report/67 of PDF). Dedicated state funds through the School Bus Replacement Program and similar initiatives also are vital to electrify school bus fleets when other funding opportunities, such as the U.S. Environmental Protection Agency’s Clean School Bus Program, have exceeded expectations but also may generate considerable competition with jurisdictions across the country for these limited federal funds. The proposed carve-out lanes for electric school buses and transit buses in EnergiIZE Commercial Vehicles in 2023 will provide vital new opportunities to electrify California school bus fleets or potentially augment US EPA funding for ZEV school bus fleets. Additionally, the benefits of vehicle-to-grid integration (VGI) technologies cannot be fully realized without the expeditious turnover of public bus fleets, including school buses, that hold great potential for VGI applications which are of increasing interest for supplementing the state’s electricity supply through battery storage at a fleet level.



Funding or incentives specifically for depot charging also should be considered for EV fleets including but not limited to private transportation companies, ride-sharing companies, etc., particularly if electrifying their fleets and depots would benefit surrounding low-income or disadvantaged communities. This is particularly salient given the CEC’s goal of providing “more than 50 percent of Clean Transportation Program funds from this investment plan toward projects that benefit low-income and disadvantaged communities” (p. 5 in report/p. 18 of PDF).

In closing, Blink Charging Co. appreciates the opportunity to comment on the CEC’s FY 2022-2023 Investment Plan Update for the Clean Transportation Program.

Thank you for your consideration.

Sincerely,

*Matthew Chen*

Matthew E. Chen  
Director, Government Affairs  
Blink Charging Company