

DOCKETED

Docket Number:	22-EVI-05
Project Title:	National Electric Vehicle Infrastructure (NEVI) Funding Program
TN #:	247284
Document Title:	bp pulse comments on CA NEVI
Description:	N/A
Filer:	System
Organization:	bp pulse
Submitter Role:	Public
Submission Date:	11/4/2022 6:45:03 AM
Docketed Date:	11/4/2022

*Comment Received From: bp pulse
Submitted On: 11/4/2022
Docket Number: 22-EVI-05*

bp pulse comments on CA NEVI

Additional submitted attachment is included below.



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November 4, 2022

California Energy Commission

Docket Unit, MS-4
Docket No. 22-EVI-05
715 P Street, Sacramento, California 95814

RE: National Electric Vehicle Infrastructure (NEVI) Funding Program

On behalf of bp pulse (bp's global electrification and charging solution brand) we applaud California's efforts to advance EV charging infrastructure deployment and we appreciate the opportunity to submit comments for the Electric Vehicle Infrastructure Deployment Plan.

bp's ambition is to become a net zero company by 2050 or sooner, and to help the world reach net zero, too. Consistent with this ambition, we are actively advocating for policies that support net zero.

bp is a global integrated energy company with a significant footprint in the United States. In the U.S., bp employs more than 12,000 people and supports about 245,000 jobs. Between 2005 and 2021, bp invested more than \$130 billion in the United States and in 2021 alone, our operations contributed about \$60 billion to the U.S. economy. We have a larger economic footprint in the United States than anywhere else in the world.

bp seeks to provide the world with secure, affordable and lower carbon energy. As part of our net zero ambition, bp is focused on providing cleaner energy and mobility solutions to countries, cities, and corporations around the world to help them decarbonize. This includes more electric vehicle (EV) charging stations – and increased access to those stations. By 2030, bp plans to grow its global network of EV charging points from around 16,000 today to more than 100,000.

As to the proposed NEVI funding program, we respectfully submit the following comments for CEC consideration. It is our hope that they will assist CEC in creating a program that is predictable, implementable and one that incentivizes investments in technologies that will drive EV charging infrastructure.

Standards

The buildout of a nationwide network of EV charging stations is a massive undertaking that will require on-the-ground coordination and partnerships. Policymakers, automakers, utilities, other service providers and more must work together to eliminate obstacles, enhance consistency, and facilitate



scale. bp encourages California to develop standards that spur multi-state regional cooperation, which can improve the customer experience for interstate travelers. Specifically, we request that California encourage utility providers to form dedicated program groups for EV design to help accelerate the permitting process.

Experience

We recommend that the experience of a Charging Network Provider be defined to include the collective experience of deploying direct current fast chargers (DCFCs) in any part of the United States, not just limited to experience of deployment within the state. A broader definition of experience will ensure that qualified, experienced providers can transfer their knowledge and skills to develop and expand within California.

Requirements

We recommend California allow exceptions to the number of ports required at a specific station where space for charging or grid capacity may be limited. For example, if stations are located within proximity of one another then the total number of ports and minimum power requirements could be achieved to meet NEVI compliance.

Ownership

We recommend that California ensure that the selected Charging Network Provider is the owner and operator of the deployed charging stations.

Thank you for your consideration and efforts. Should you have any questions regarding our comments, please contact Abigail Motsch, bp's EV Incentive and Proposal Advisor at abigail.motsch@bp.com or 281-800-1787.

Sincerely,

A handwritten signature in black ink, appearing to be "Tony Forte".

Tony Forte