

**DOCKETED**

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**ChargePoint\_20-TRAN-04\_ EV Infrastructure Project Funding**

*Additional submitted attachment is included below.*



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February 17, 2023

California Energy Commission  
Re: Docket No. 20-TRAN-04  
1516 Ninth Street Sacramento, CA 95814

Submitted to on-line portal:  
<https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=20-TRAN-04>

**Re: Docket Number 20-TRAN-04, Electric Vehicle Infrastructure Project Funding, LDEV Allocation**

ChargePoint appreciates the opportunity to provide comments on the California Energy Commission (CEC) Light-Duty Electric Vehicle Infrastructure Allocation Workshop and charging infrastructure project concepts. 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.

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.

We appreciate the CEC staff for their engagement efforts and hope the comments below help inform this process.

**I. Upcoming Solicitations**

ChargePoint appreciates the CEC's leadership in overseeing more than \$900 million allocated for light-duty charging infrastructure. Investing in a mix of private and public infrastructure will help to fill gaps, particularly for multi-family homes, and in priority population communities, which include disadvantaged and low-income communities.

Ensuring a reliable charging experience is critical to encouraging wider adoption of EVs. ChargePoint encourages the CEC to consider allocating funding, within upcoming solicitations, to support reliability upgrades, operations and maintenance, and station retrofits. This will help to improve existing stations to meet the upcoming reliability requirements.

**II. Proposed Concepts**

ChargePoint supports the CEC's initiative to focus investment on a variety of light duty charging use cases, including at home, around town and corridor charging. ChargePoint commends the CEC on their continued efforts to identify funding concepts that can provide charging opportunities to meet its goals of providing equitable at-home solutions for multi-family residences, targeting



deployments in rural and priority communities, and building out a broad network of high-power fast chargers.

Charging companies could more efficiently meet CEC's deployment goals, identify site hosts, and thereby streamline charging infrastructure installation if funding programs were more targeted and designed to fill gaps not addressed by other programs. Currently there are multiple state and federal funding opportunities that are very similar in nature, creating marketplace uncertainty when determining how to prioritize and navigate grants on a continuous basis. ChargePoint recommends the CEC work in alignment with federal programs that can support the state's clean transportation goals and allocate funding to address gaps in funding.

#### **A. Finding Solutions to Local Charging Needs**

The Infrastructure Investment and Jobs Act of 2021 (IIJA), includes significant new funding to support community grant funding for states, local governments, metropolitan planning organizations, and other public-sector entities to support the installation of publicly accessible charging infrastructure prioritizing rural and priority populations communities with a low ratio of private parking spaces. ChargePoint strongly recommends the CEC focus on areas that the federal government did not target through the upcoming Charging and Fueling Infrastructure Discretionary Grant Program (CFI Program) and consider allocating funding specifically aimed at supporting charging infrastructure on publicly owned properties. Another option would be to provide match funding to support the CFI program instead of duplicating efforts.

ChargePoint encourages the CEC to support and educate municipalities on the differences and parallels in EV charging infrastructure funding opportunities, including CEC funding and federal funding. Municipalities could benefit from hearing best practices that have been learned through CEC projects, including those implemented across California cities.

#### **B. Grid-light and Resilient Charging**

ChargePoint encourages solicitations to allocate funding to strategies that include reducing grid impact, such as power sharing among chargers, and allowing onsite batteries, which can minimize overall site installation and operation costs. ChargePoint agrees it is critical for DCFC operators to consider the grid impact of their buildout, and ChargePoint helps customers minimize their grid impact in a variety of ways:

- Infrastructure optimization – ChargePoint's Express Plus (EXPP) platform is designed modularly to maximize the number of vehicles that can be charged under the same power limit. The EXPP allows multiple ports to connect to a single power source (200kW) to share power amongst many vehicles, but to also provide high power access to any single vehicle when required. This station also allows owners to dynamically share power amongst many vehicles to maximize energy dispensed and minimize a site's power needs.



- Power management through software – Through ChargePoint’s software, customers can set power limits based on time of day. This allows customers to minimize power usage during critical peak hours.
- Onsite Energy Storage – ChargePoint’s recently announced partnership with global leader in AI-driven clean energy solutions and services, Stem, was developed to solve for a facilities grid impact, grid limitations and resiliency. Energy storage can be used to reduce peak power usage, reduce energy use during high demand hours, and service EVs in times of grid outage.

The tolerance for an outage will vary significantly based on the charging use case. ChargePoint believes setting a minimum may deter some installations as building in resiliency adds significant costs. Instead, we believe it would be more beneficial to incentivize resiliency. This would add costs to projects that are considering some level of resiliency. ChargePoint also recommends the CEC incentivize public charging locations amongst “critical traffic corridors” to build in resiliency. These corridors should have sufficient coverage during the outage periods to allow EV drivers to travel.

### **C. Charging at Single-Family Homes**

ChargePoint strongly supports block grants for single-family homes and considers this funding opportunity to be extremely important given that existing California Public Utilities Commission (PUC) utility incentive programs and EV infrastructure rules exclude single family residences. We also support that the proposed at-home charging block grant concept is open to third-party rebate implementers and believe community organizations and other non-profits are well suited to support single family home incentive programs.

ChargePoint recommends the CEC avoid overcomplicating the program with grid-integrated vehicle electrification requirements which could otherwise be supported through PUC incentives. ChargePoint recommends the grant focus on the overall program goal to provide equitable home charging in rural and priority populations and in affordable housing sites.

ChargePoint recommends the CEC structure the block grant so applicants can qualify for additional funding if installing networked Level 2 charging, and strongly recommends the CEC remove eligible costs for Level 1.

Networked Level 2 charging will be vital to ensuring that EV charging benefits the distribution grid by enabling customers to have advanced load management capabilities to facilitate off-peak charging and other managed charging strategies. A networked L2 charger can also collect interval data to inform usage patterns and provide enhanced network communication capabilities. These capabilities can be significant to enable charging since the networked charger provides information related to charging behaviors and load profiles. Requiring Level 2 exclusively will help to future-proof investments in EV charging infrastructure and enable customers to reap significant benefits from increased functionality and wider future program design options.

#### **D. Charging at Multi-Family Sites**

ChargePoint supports the CEC's commitment to provide greater equity to priority populations, including affordable housing sites, by providing financial assistance to install charging stations in multi-family homes. ChargePoint respectfully recommends the 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 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 for priority and rural areas, which can encourage greater participation within these communities.

ChargePoint recommends removing the proposed project sites within ¼ mile of an affordable, multi-family housing site eligibility as most charging is needed on site, at home, exclusively for affordable housing residents. Funding to increase community charging benefits could be served by existing programs such as Communities in Charge, or through the upcoming FHWA CFI Program.

ChargePoint considers multi-family homes to have some of the greatest need for funding and strongly supports CEC's initiative to focus investment on new and multi-family dwelling retrofits to effectively deploy chargers and infrastructure. ChargePoint requests clarification or assistance with coordination, with local AHJs, on the proposed solicitation requirement to exceed the State building code readiness requirements, - specifically if the EV charging installation exceeds the State code but meets local building codes.

#### **E. DC Fast Charging Solicitations**

ChargePoint understands that the upcoming FHWA CFI Program may support the installation of public curbside or metered parking DCFC. ChargePoint recommends the CEC allocate complementary funding to local municipalities and utilities to address any gaps in this upcoming discretionary grant program and allow partners to apply with, and on behalf of, cities for such funding, similar to how Federal clean school bus rebate applications are structured.

ChargePoint suggests the CEC consider curbside charging in the upcoming CHILL-2 solicitation to understand possible hurdles in installation, operation, and maintenance, including permitting and enforcement. ChargePoint believes Level 2 charging would be more appropriate than DCFC for public curbside and metered parking, as the typical Level 2 charging session may be more suitable for the typical dwell time of a public parking stall. While a DCFC session could benefit a limited duration parking stall, the installation cost of a DCFC would be prohibitive compared to a Level 2 installation in a parking stall that permits a longer duration. ChargePoint recommends the CEC consider solicitations that support DCFC installed in public loading zone parking stalls, and other time-restricted stalls, where vehicles could utilize the infrastructure and better serve this use case, generally 20-minutes. DCFC equipment also requires considerable electrical infrastructure and space requirements which may pose to be a challenge for municipal curbside installations.



Once municipalities install curbside charging, parking rules for impacted stalls will need to be updated to reflect the charging profile of the equipment utilized (i.e., limit DCFC stalls to 30 minutes, limit L2 stalls to two to four hours). Additionally, new signage will be required for the impacted stalls, as well as the need to transmit these changes to the appropriate parking enforcement agency.

### **III. 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 [john.schott@chargepoint.com](mailto:john.schott@chargepoint.com) if you have any questions or if we can provide additional information.

Sincerely,

A handwritten signature in blue ink that reads "John Schott". The signature is written in a cursive, flowing style.

John Schott  
Director, Grant Development  
ChargePoint