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**EVgo Comments on CALeVIP and the Golden State Priority Project Implementation**

*Additional submitted attachment is included below.*

April 26, 2023

California Energy Commission  
715 P Street  
Sacramento, CA 95814

**Re: Docket No. 22-EVI-01 – Comments on CALeVIP 2.0 and the Golden State Priority Project Implementation**

**Introduction**

EVgo appreciates the opportunity to submit comments on California Energy Commission’s (CEC) Golden State Priority Project (GSPP) implementation. With more than 900 fast charging locations nationwide, EVgo’s owned and operated charging network serves over 60 metropolitan areas in over 30 states and more than 550,000 customer accounts. Headquartered in Los Angeles, EVgo’s fast charging network includes over 330 charging locations in California.

EVgo supports the goals of the GSPP and recognizes the critical role the program plays in accelerating fast charger deployment to meet state zero emission vehicle (ZEV) targets. However, EVgo recommends that the CEC revisit key technical provisions – including ENERGY STAR – given lack of synergy with the new National Electric Vehicle Infrastructure (NEVI) program minimum standards set forth by the Federal Highway Administration (FHWA). In the case where NEVI standards defer to states to set their own standards, EVgo recommends a temperature check process be undertaken prior to the next GSPP solicitation and again in early 2024 to better understand developments in EV charging technology so as not to unintentionally delay deployments needed to meet California state goals.

**1. The CEC should align its GSPP standards with NEVI, which does not include the ENERGY STAR certification requirements contemplated for direct current fast charging (DCFC).**

In February 2023, FHWA released final standards for the implementation of the NEVI program.<sup>1</sup> These standards, which were developed with substantial stakeholder input, declined to adopt ENERGY STAR certification requirements for eligible fast charging equipment. In the final standards, the Administration noted that “commenters wrote in agreement with FHWA that ENERGY STAR certification for DCFCs was premature” and that NEVI would require “ENERGY STAR certification only of AC Level 2 chargers, for which standards are well-established.”<sup>2</sup>

EVgo recognizes the role that the NEVI minimum standards play in establishing consistent requirements for electric vehicle service providers (EVSPs) nationwide, and, through the Governor’s budget trailer bill (RN 23 12267), California is already trying to codify alignment with NEVI on other requirements, including payment methodologies.<sup>3</sup> As such, EVgo encourages the CEC to harmonize GSPP requirements with NEVI.

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<sup>1</sup> <https://www.govinfo.gov/content/pkg/FR-2023-02-28/pdf/2023-03500.pdf>

<sup>2</sup> *Id.* At 17.

<sup>3</sup> <https://esd.dof.ca.gov/trailer-bill/public/trailerBill/pdf/852>

**2. ENERGY STAR certification requirements for fast charging equipment conflict with the provision of a safe, reliable, and convenient charging experience necessary to accelerate ZEV adoption.**

Altogether, the ENERGY STAR certification for DCFC as it exists today has many technical requirements that may conflict with a safe, reliable fast charging experience for customers. If included in the GSPP, CEC risks funding installations that may diminish state goals for uptime and customer experience.

Features such as status lights that are plainly visible to EV drivers that indicate whether a charger is available, reserved, or under maintenance help customers receive a successful charge when they pull up to a charger. Security enhancements, including additional lighting and cameras, are other features that may be integrated into chargers to increase customer comfort and safety at charging stations. With vandalism as one of the top reasons for EV charger downtime, integrating security equipment is one way to deter vandalism and improve charger uptime. Additionally, next-generation high-powered fast chargers with liquid cooled cables will also come with new features to improve cold weather performance and help ensure that drivers can receive the fastest available charge in extreme weather conditions.

Together, these safety and performance enhancements increase energy consumption and would likely need to be abandoned or delayed in pursuit of ENERGY STAR compliance. As such, the ENERGY STAR standard itself may need to be modified to ensure it may be inclusive of these important customer experience features, and the process for such modifications remains uncertain. EVgo encourages the CEC to consider these customer experience tradeoffs when developing programs designed to accelerate widespread, reliable, and equitable transportation electrification.

**3. CEC should incorporate a “temperature check” process on all new technical requirements - including OCA certification - to ensure that premature imposition of new standards does not limit the pool of manufacturers available to participate in future solicitations.**

At this time, no charging equipment on GSPP’s Eligible Equipment Dashboard meet the July 1, 2023 program requirements – which currently includes ENERGY STAR, OCA certification, and more.<sup>4</sup> EVgo is concerned that few charging models, if any, will be eligible for future near-term GSPP solicitations, especially for high power charging equipment needed to meet customer demand for faster charging technology as EV battery capabilities evolve. Even if a select few manufacturers do meet all technical requirements by July 2023, there is no certainty that those limited suppliers will meet forthcoming state standards for charger reliability or the stringent standards that EVSPs like EVgo establish to ensure their equipment in the field meet robust reliability requirements.

While EVgo suggests as much alignment with federal minimum standards as possible, EVgo also understands that in some instances, the minimum standards provide high level guidance but defer to the states on implementation details. In the case where NEVI standards defer to states to set their own standards, and the CEC decides to pursue them, EVgo recommends a temperature check process be undertaken by the CEC to better understand developments in EV charging technology with both EVSPs and manufacturers.

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<sup>4</sup> <https://calevip.org/calevip-eligible-equipment>

## Conclusion

To support competitive, high-quality applications similar to GSPP's first round solicitation in Eastern and Central regions, EVgo encourages CEC to implement the thoughtful, data-driven approach to implementing new technical requirements as discussed above. The CEC has an unprecedented opportunity to accelerate progress toward the achievement of California's zero emission vehicle (ZEV) goals, and EVgo looks forward to supporting these efforts through the deployment of convenient, reliable, and affordable charging infrastructure that meets drivers' and fleets' evolving needs. Please do not hesitate to be in touch if we can be a resource.

Respectfully submitted this 26<sup>th</sup> day of April,

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