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*Comment Received From: ChargePoint
Submitted On: 5/9/2023
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on CALeVIP 20

Additional submitted attachment is included below.



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May 9, 2023

Brian Fauble
California Energy Commission
715 P Street
Sacramento, CA 95814
(Submitted Electronically to docket@energy.ca.gov)

RE: Docket No. 22-EVI-01 – Comments on the California Electric Vehicle Infrastructure Program 2.0 (CALeVIP 2.0) Golden State Priority Project (GSPP) Implementation

Dear Mr. Fauble,

ChargePoint, Inc. (ChargePoint) would like to express our appreciation at the opportunity to comment on the California Energy Commission's (CEC) California Electric Vehicle Infrastructure Program 2.0 (CALeVIP 2.0) Golden State Priority Project (GSPP) equipment requirements.

Background

Since 2007, ChargePoint has been committed to making it easy for businesses and drivers to go electric, with the largest electric vehicle (EV) charging network and the most complete set of charging solutions. In pursuit of our goal, ChargePoint has enjoyed numerous partnerships with the CEC, and together we have helped accelerate EV charging deployment in rural communities, along highway corridors, and within multifamily properties. We have increased our California-based EV charging manufacturing and supply chains, and have stimulated clean energy jobs throughout the state. ChargePoint continues to build the new fueling network to move all people and goods on electricity and looks forward to our continuing partnership with the CEC.

Requesting Delay in Energy Star Certification Deadline

ChargePoint respectfully requests that the implementation date be delayed for requiring ENERGY STAR certification on direct current fast charging (DCFCs) stations under the CALeVIP 2.0 Golden State Priority Project grant programs. We suggest pushing it back by several months to allow sufficient time for certification of new products.



ChargePoint supports the CEC's decision to require ENERGY STAR certification on EV chargers, and we are committed to obtaining certification for our DCFC product by Fall 2023. However, we respectfully request that the CEC consider delaying the implementation of this requirement for DCFC until at least October 2023 to allow for healthy competition and innovation within the DCFC hardware market by allowing more time for DCFC hardware to be certified.

Requesting Delay in Open Charge Point Protocol (OCPP) Certification

Currently, there is no public test tool available for OCPP 2.0.1. Without a testing tool available, products developed using OCPP 2.0.1 cannot be certified. While CEC's proposed requirements for the GSPP require OCPP 1.6 or later, this disadvantages chargers that have been developed using the latest version of OCPP, 2.0.1.

ChargePoint and other vendors who have developed their equipment and software utilizing the latest version of OCPP, should not be disadvantaged because a third-party organization has not yet released a public testing tool. Thus, ChargePoint respectfully requests that the CEC postpone the OCPP 2.0.1 requirement until December 2023, or alternatively, allow EV charging companies to self-certify for version 2.0.1 until December 2023.

ChargePoint is working closely with the OCA on the development of these tools and is closely monitoring for the eventual release of the test tool. We are keen to have our stations certified as soon as feasible once the testing tool is released. However, we note that testing may be a time-consuming process and sufficient time for manufacturers to internally validate software using the public testing tool and for official OCA testing should be allowed. Additional time could be required if a testing tool is delayed further or if a queue develops at OCA approved testing facilities.

Thank you for your consideration of our comments. We look forward to our continued conversations on this topic. Please do not hesitate to reach out to me if you have any questions at derek.dolfie@chargepoint.com.

Sincerely,

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

Derek Dolfie
Senior Public Policy Manager, California
ChargePoint, Inc.