

**DOCKETED**

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**ChargePoint Comments Docket 23-ALT-01\_2023-2024 Investment Plan Update**

*Additional submitted attachment is included below.*



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May 11, 2023

California Energy Commission  
Re: Docket 23-ALT-01  
1516 Ninth Street Sacramento, CA 95814

Submitted to on-line portal:

<https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=23-ALT-01>

**Re: Docket 23-ALT-01, 2023-2024 Investment Plan Update for the Clean Transportation Program**

ChargePoint appreciates the opportunity to provide comments on the California Energy Commission's (CEC) 2023-2024 Investment Plan Update for the Clean Transportation Program (CTP). The implementation of this plan will help yield climate benefits, equitable access to zero-emission vehicle (ZEV) infrastructure, innovation, and the acceleration of advanced transportation and fuel technologies. The CTP will also continue to ensure that the state can maintain the workforce and market growth necessary to transition our transportation sector. We value the CEC for their efforts to prioritize the state's transition to ZEV transportation by reinvesting in the programs that will ultimately help us reach our decarbonization goals.

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

**Question: #1 Does the timing and allocations between light-duty and medium-duty/heavy-duty infrastructure investments in the Investment Plan strike the right balance for ZEV acceleration? If not, where should adjustments be made and why?**

ChargePoint agrees that public and private funding will play an important role in the transition to Medium-and Heavy-Duty (MD/HD) zero-emission vehicles and supporting infrastructure deployment throughout the state. ChargePoint recommends that the current allocation for MD/HD ZEV Infrastructure investments should be increased, with some funding originally allocated to Light-Duty Electric Vehicle Charging Infrastructure instead allocated to MD/HD infrastructure investments. Light-duty passenger vehicle charging projects often cost substantially less than MD/HD projects, due to lower power requirements for charging light-duty vehicles, and because light-duty charging projects often involve a smaller quantity of charging stations than fleet charging projects. MD/HD infrastructure investment projects tend to support fleets, which in some cases can serve hundreds of MD/HD vehicles at a single site, further increasing project costs and needs. Even moderately sized fleet charging projects can reach megawatts of power



needed to support all MD/HD EVs at a single fleet depot. The electrical infrastructure, installation, construction considerations, and equipment needed to support such projects, greatly increases the overall costs involved in these types of projects, which furthers the need for increased funding levels for MD/HD EV charging. ChargePoint also recommends the School Bus ZEV Infrastructure category funding should extend beyond 2023-2024. The sometimes-lengthy process school districts must navigate to find, apply for, and secure funding means that the currently proposed investment schedule may conclude before most school districts can organize resources to apply for funding. ChargePoint recommends that additional funding should be added in 2024-2025 and 2025-2026 to allow adequate time for school districts, as public entities, to secure funding.

**Question #2 Does the Investment Plan reflect the needs of low-income, disadvantaged, or underrepresented Californians and California communities? If not, what changes to the Investment Plan should the CEC consider?**

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 single-family dwellings and multi-family housing, targeting deployments in rural and priority communities. ChargePoint recommends the CEC to allocate funding to specific categories and programs that are principally aimed at low-income, disadvantaged communities rather than combining equity requirements into funding opportunities that have distinct goals and objectives. The Equitable At-home Charging category is a great example of a program that considers funding exclusively to provide equitable home charging in priority populations and in affordable housing sites.

**Question #3 Is there additional context, e.g., new regulations (like Advanced Clean Fleets) or market changes (like accelerating passenger EV sales), that we should factor into our decision-making on priorities?**

The U.S. Department of Transportation's (DOT) Federal Highway Administration (FHWA) National Electric Vehicle Infrastructure (NEVI) Formula Program includes significant funding to support the installation of publicly accessible charging infrastructure. When considering new regulations, ChargePoint strongly encourages the CEC to align with the NEVI final minimum standards specifically for definitions and formulas for evaluation such as uptime. Alignment on definitions and formulas will provide an efficient way to measure key metrics of the California programs.

ChargePoint also recommends the CEC consider flexibility in the required power levels for Direct-current fast charger (DCFC). ChargePoint supports a varied approach to DCFC power levels, including 50 kW–150 kW for light duty vehicles, to serve diverse EV charging use cases and we strongly believe that it is critical to consider the grid impacts of DCFC. We encourage strategies such as power sharing among chargers and onsite batteries to be allowed, which can minimize overall site installation and operation cost as well as reducing the grid impact.



**Question #4 Given the realities of the current state budget, are there any changes you'd make by shifting fungible Clean Transportation Program dollars to other categories?**

ChargePoint recommends the CEC shift Hydrogen Fueling Infrastructure program dollars to the Medium- and Heavy-Duty ZEV Infrastructure category, which already incorporates hydrogen.

Ensuring a reliable charging experience is critical to encouraging wider adoption of EVs. We understand that the CEC may soon be releasing reliability guidance pursuant to [[AB 2061 \(Ting, 2022\)](#)] and ChargePoint stands ready to work with the state on continuing to provide a reliable charging experience for our customers. We understand it can be difficult for some station operators to afford necessary upgrades now and keep their stations operational long after the incentive funding has run out, particularly in lower income areas and with public customers. ChargePoint encourages the CEC to consider shifting funding to a dedicated maintenance program category to support existing charging infrastructure (i.e., to conduct necessary improvements to stations installed prior to current regulations), for instance CEC could leverage the Light-Duty Electric Vehicle Charging Infrastructure funding.

**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 [margaret.larson@chargepoint.com](mailto:margaret.larson@chargepoint.com), if you have any questions or if we can provide additional information.

Sincerely,

*Margaret Larson*

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ChargePoint