

**DOCKETED**

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**ChargePoint Comments Docket 22-EVI-03 2023 Update to the  
National Electric Vehicle Infrastructure Plan**

*Additional submitted attachment is included below.*



ChargePoint, Inc.  
240 East Hacienda Avenue | Campbell, CA 95008 USA  
+1.408.841.4500 or US toll-free +1.877.370.3802

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California Energy Commission  
Docket Unit, MS-4  
Docket No. 22-EVI-03  
715 P Street Sacramento, California 95814

Submitted to on-line portal:

<https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=22-EVI-03>

**Re: Docket 22-EVI-03 2023 Update to the National Electric Vehicle Infrastructure Plan**

ChargePoint appreciates the opportunity to provide comments on the development of California's update to its Deployment Plan for the National Electric Vehicle Infrastructure (NEVI) Formula Program for 2023. 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 most complete set of charging solutions. In pursuit of our goal, ChargePoint has enjoyed numerous partnerships with the California Energy Commission (CEC), and together we have helped accelerate EV charging deployment in rural communities, along highway corridors, and on multi-family properties. As ChargePoint continues to create the new fueling network to move all people and goods on electricity, we look forward to continued collaboration and partnership with the CEC and California Department of Transportation (Caltrans) on the implementation of the California State Electric Vehicle Infrastructure Deployment Plan.

We commend CEC and Caltrans staff for their efforts to engage stakeholders in developing the plan and hope the comments below help inform this process.

**Question: What are the key issues for consultation with California utilities?**

ChargePoint understands that utilities will play a critical role in helping achieve California's NEVI strategy and will be faced with strict timelines and oversight requirements. ChargePoint encourages California to develop a common methodology to assess each applicants' utility readiness component, as required to meet the Project Implementation and Readiness criteria. ChargePoint recommends that California coordinate with the utilities to understand and establish a standardized process to use in evaluating project proposals.

For example, like the Site Verification Form used for CALeVIP, the CEC could develop and provide a utility verification form to be filled out by applicants and the electric utility for each site. The form would document some degree of coordination and project readiness and could include fields clearly identifying which utility provides power to the specific site, if 3-phase power is available,



and identifying any circuit capacity constraints. This utility verification form could be helpful in the proposal review and evaluation.

We also recommend the CEC provide a utility point of contact per region on the docket website and inform utilities regarding their role to support utility consultation efforts. Having this information readily available can support coordination and help to streamline the process for meeting NEVI project readiness requirements.

**Question: Are there any major market changes to charging infrastructure or battery electric vehicles that we should be aware of as we update the plan?**

In May 2023, the Ford Motor Company announced the integration of Tesla’s North American Connector Standard (NACS) into their EVs and in June 2023, General Motors and Rivian announced they would equip new vehicles with NACS charge ports starting in 2025. With the backing of major automakers like General Motors and Ford, NACS will be needed as part of the overall solution to meet the state’s current and future charging demands.

Several EV charging operators, including ChargePoint, have recently announced that they will offer NACS connectors as an option to customers for specific products later this year. For more than 15 years, ChargePoint has been enabling the mass adoption of electric vehicles for consumers and businesses. ChargePoint remains committed to delivering the best charging experience possible to all drivers of all makes and models of electric vehicles and to offer products that enable customers to serve the charging needs of any EV in any parking space.

While NACS will be needed to meet future charging demands, additional time to standardize the NACS connector, since to date, NACS has only served Tesla vehicles. CharIN and SAE have announced plans to standardize the safety, security, and interoperability of this previously proprietary connector and ChargePoint is committed to being a part of these efforts. We encourage the CEC to monitor this standardization process as well. As charging manufacturers, we will continue to update our products accordingly, but this effort will take time and California should not move prematurely to require NACS connectors.

ChargePoint strongly encourages the CEC to align with the Federal Highway Administration (FHWA) NEVI Program requirements when considering new regulations. The NEVI Program requires a minimum of four Combined Charging System (CCS) ports. Having uniform standards and mechanisms, such as using the same definitions and formulas, would provide a consistent and clear approach and support transparent and well-defined programs preventing applicant confusion.

**Question: How will the new definition of “Built -Out Creditable Station” affect our NEVI analysis and deployment strategy?**

With the updated guidance provided by FHWA on June 2, 2023, and the additional details regarding “Fully Built Out Criteria” it may prove challenging for any existing or planned stations to count as a creditable station. We request clarification from CEC as soon as possible on



whether they intend to work with those existing and planned station operators to bring those stations up to NEVI minimum requirements or if additional stations will be needed to fill gaps that were previously not targeted for investment.

Due to the extended timeline for determining site readiness and identifying site hosts, timely notice of eligibility, particularly whether planned and existing stations will be counted, will result in a more appropriate allocation of capital investment to build out NEVI compliant projects.

**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*

Margaret Larson  
Senior Manager, Public Private Partnerships  
ChargePoint