

DOCKETED

Docket Number:	20-TRAN-04
Project Title:	Electric Vehicle Infrastructure Project Funding
TN #:	251493
Document Title:	ChargePoint Comments on Municipal (Government) Fleets Electric Vehicle Infrastructure
Description:	N/A
Filer:	System
Organization:	ChargePoint
Submitter Role:	Public
Submission Date:	8/4/2023 11:42:23 AM
Docketed Date:	8/4/2023

*Comment Received From: ChargePoint
Submitted On: 8/4/2023
Docket Number: 20-TRAN-04*

**ChargePoint Comments on 20-TRAN-04 Municipal (Government)
Fleets Electric Vehicle Infrastructure**

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

California Energy Commission
715 P Street
Sacramento, CA 95814

Subject: ChargePoint Comments on 20-TRAN-04: Municipal (Government) Fleets Electric Vehicle Infrastructure

Dear California Energy Commission program staff,

ChargePoint, Inc. (ChargePoint) respectfully submits this letter in response to the California Energy Commission's (CEC) request for comments regarding the Municipal (Government) Fleets Electric Vehicle Infrastructure Program. This program will help California achieve its climate change goals by facilitating the adoption of electric vehicles (EVs) among government fleets throughout the state. In addition to reducing greenhouse gas (GHG) emissions, this program will advance transportation equity and environmental justice for California communities that currently have few to no EVs operating within their local governments. ChargePoint applauds CEC for this forward-thinking and much-needed solicitation. We offer the following comments to provide our input in shaping implementation strategies for this critical program to help CEC lead the way towards a sustainable future.

Founded in 2007, ChargePoint is a leading global electric vehicle charging network that is headquartered in Campbell, California. EV charging is all we do, and we do it all. Passenger cars, delivery vehicles, buses, and more—we charge any EV, anywhere it goes. We have built a fully integrated portfolio of hardware, cloud services and support with the best technology in the industry. We offer solutions for home, government, multi-family, commercial, and fleet electric vehicle charging infrastructure. ChargePoint's hardware offerings include Level 2 (L2) and DC fast charging (DCFC) products, and we provide a range of options across those charging levels for specific use cases including light duty, medium duty, and transit fleets, multi-unit dwellings, residential (multi-family and single family), destination, workplace, and more. ChargePoint's software and cloud services enable EV charging station site hosts to manage charging onsite with features like access control, charging analytics, and real-time availability. With modular design to help minimize downtime and make maintenance and repair more seamless, all products are UL-listed, and many of our Level 2 solutions are ENERGY STAR® certified.

Please see our comments below:

- + **ChargePoint respectfully requests that CEC eliminate the 25% cap for DC fast chargers** from the program requirements. As was commented on during the Pre-Solicitation Workshop on July 21, 2023, DC chargers are essential for certain government fleet vehicles, particularly those involved in emergency response services (police, fire, etc.). These types of fleet vehicles require fast charging to perform their daily duty cycles, which often involve deployment at a moment's notice and require the vehicles to be fully charged at any given time. Level 2 chargers, in most cases,

would not be able to meet the charging needs of these vehicles. Rather than establishing an arbitrary percentage cap for DC chargers for applicants, CEC should take into consideration the type and duty cycle of the government fleet vehicle involved in the application. At a minimum, CEC should eliminate the 25% DC cap for applicants that indicate that their grant-funded chargers will support emergency response vehicles, in order to more effectively meet the unique needs of these fleets.

- + **ChargePoint strongly recommends that CEC not require municipalities to be permit-streamlined** to participate in this program. According to the Governor's Office of Business and Economic Development's (GO-Biz) EV Charging Station Permit Streamlining Map, many municipalities across the state remain in streamline-pending and non-streamlined status, including many in disadvantaged and low-income communities throughout the state. CEC should not penalize these communities by prohibiting their governments from applying to this critical program. As was commented on during the Pre-Solicitation Workshop, many stakeholders agree with this recommendation and see this requirement as a barrier to entry for communities already struggling with EV adoption. For a more just, equitable, and effective program, CEC should allow all otherwise eligible municipalities to apply to this program.
- + **ChargePoint strongly recommends that CEC should not score applications higher if they choose to make their chargers available to the public.** Most fleets, including government light-duty (LD) fleets, domicile their vehicles at depots inaccessible to the public for safety, security, and operational reasons. It would be unsafe for a fleet to open their fleet depot to the public due to the danger of vehicle collisions. Additionally, security issues arise from unauthorized individuals being able to access fleet vehicles, if fleet depots are made accessible to the public. Finally, fleets must be able to charge their vehicles at times that meet their operational needs, so if fleet chargers are open to the public, the fleet may not have access to its chargers when needed. These comments were also made by many stakeholders during the Pre-Solicitation Workshop. Because most fleet operations cannot accommodate public accessibility, CEC should not score applications with public accessibility higher than applications that do not offer public accessibility. This will create a program that is more reflective of the actual operational needs of government fleets across the state.
- + **ChargePoint agrees that CEC should allow grant-funded chargers to incidentally charge medium-duty vehicles** as appropriate. Most government fleets are composed of light-, medium-, and heavy-duty vehicles, and in some cases these vehicle types are all domiciled together at the same fleet depot. For fleets applying to this program that have, or will have, more than just LD EVs, having the ability to share grant-funded chargers with these medium- or heavy-duty (MHD) EVs will represent a great benefit to these fleets. Just as CEC's MHD complement to this program, EnergIZE, allows incidental charging of LD EVs, CEC should allow incidental charging of MHD EVs for this program. This flexibility will provide improved benefits to government fleets and have the added bonus of greater emissions reductions credited to this program, as the emissions generated by MHD vehicles are larger than those generated by LD vehicles.

ChargePoint thanks you for the opportunity to submit our comments on this critical program. We look forward to continued collaboration with the CEC to help shape the guidelines and implementation of this important program that will reduce emissions through the continued electrification of our state's government fleets. ChargePoint strongly supports CEC's track record as a leader in the clean energy space



in the country. Should you have any questions about our comments made within this letter, please do not hesitate to contact me at the information listed below. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Claire Garcia".

Claire Garcia
Fleet Grant Development Manager
ChargePoint, Inc.
Claire.garcia@chargepoint.com