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| <b>Project Title:</b>   | Electric Vehicle Infrastructure Project Tracker |
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**EV Project Tracker\_ChargePoint Comments\_Docket 23-TRAN-02\_**

*Additional submitted attachment is included below.*



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California Energy Commission  
Docket Unit, MS-4  
Docket No. 23-TRAN-02  
715 P Street Sacramento, California 95814

Submitted to on-line portal:

<https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=23-TRAN-02>

**Re: Docket #: 23-TRAN-02 Electric Vehicle Infrastructure Project Tracker**

ChargePoint appreciates the opportunity to provide comments regarding the development of the proposed Electric Vehicle Infrastructure Project Tracker.

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 with the CEC to accelerate California's transportation electrification goals.

ChargePoint recognizes developing tools to support the deployment of CEC-funded EV charging projects is critical to achieving California's electrification goals and can be valuable in highlighting specific challenges in the EV charging implementation process faced by all projects. We commend the CEC staff for their efforts to engage stakeholders and gather input on an EV Infrastructure Project Tracker tool and hope the comments below help inform this process.

*EV Infrastructure Project Tracker tool usability*

ChargePoint understands that maintaining data integrity is critical for the Electric Vehicle Infrastructure Project Tracker to provide useful information for stakeholders on EV charging project timelines and bottlenecks. ChargePoint recommends the Tracker's reporting fields be clearly named and defined to ensure all users and stakeholders interpret and populate the fields the same way. Ensuring the provided data is consistent and accurate will help to enable the CEC to identify specific challenges in the project completion process. ChargePoint also recommends the CEC prioritize the usability design and ease-of-use of the Tracker by grant recipients to easily navigate the portal and provide updates on the requested benchmarks, to avoid increasing additional steps and hurdles to the grant implementation process.



*What timeline data is appropriate to collect?*

ChargePoint recommends the CEC require users to include the date the utility construction was *requested* to be scheduled. Grant recipients can spend a substantial amount of time to get on a utility's calendar to begin construction, as utility work on electric vehicle supply equipment (EVSE) may be delayed due to other priorities such as wildfire response or Public Safety Power Shutoffs. This step can be a perpetual bottleneck in the EVSE project process. Since utility construction start and complete dates will not capture time and steps taken by grant recipients in between design and construction, it is pivotal that the tracker includes a request for construction date. Further, the current reporting requirements as proposed include an energization date, which describes the date in which the utility turned on the power to the site at the end of utility construction. Meanwhile, EVSE providers generally have a process to commission and activate the station post-energization for stations to be used by drivers. To capture the timeline for this process, ChargePoint recommends also requiring EVSE activation date.

ChargePoint also recommends the tracker require identifying and reporting the electric rule the project is taking service under. Within the large IOUs' service territories, new service requests for EVSE may occur under Rule 15/16 or the EV Infrastructure Rules 29/45. The California Public Utilities Commission (CPUC) currently requires the IOUs to record timeline data for specified energization steps for EV projects taking service under Rules 29/45. However, the proposed tracker should collect timeline data for both the EV Infrastructure Rules 29/45 and the traditional line extension rules 15/16, as most new service requests for EVSE still occur under Rule 15/16. This data will provide further insight into energization timelines, the number of projects taking service under each rule, and discrepancies between the rules.

*Should timeline data be summarized at the county level, or displayed for each individual CEC-funded EV charging project site?*

Data summarized at a granular level, such as site, project, or address, may disclose commercially sensitive information that would inhibit the competitive market for EV charging hardware and network services. ChargePoint strongly recommends the CEC capture and summarize timeline data at the county or Authorities Having Jurisdiction level rather than at the site, project, or address level.

**Conclusion**

Thank you for your consideration of our comments. 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*

Senior Manager, Public Private Partnerships  
ChargePoint