

DOCKETED

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*Comment Received From: Claire Garcia
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ChargePoint Comments on 18-TRAN-01 Staff Draft Guiding Principles for SB 114 Funded Charging & Refueling Infrastructure Program

See attached document.

Additional submitted attachment is included below.



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December 8, 2023

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Docket 18-TRAN-01, Staff Draft Guiding Principles for SB 114 Funded Charging and Refueling Infrastructure Program

ChargePoint appreciates the opportunity to provide comments on the California Energy Commission's (CEC) Staff Draft Guiding Principles for SB 114 Funded Charging and Refueling Infrastructure Program. The implementation of these funds will help yield climate benefits, equitable access to zero-emission school transportation for California's youth, and accelerate the deployment of clean school buses across the state. We value the CEC for their efforts to prioritize the state's transition to zero-emission transportation by investing in programs that will help California attain its ambitious climate goals.

ChargePoint has enjoyed numerous partnerships with the CEC, and together we have helped accelerate electric vehicle (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 EV charging networks and a comprehensive portfolio of charging solutions available today. We appreciate the engagement efforts of the CEC staff and hope the comments below help inform this process.

- + ChargePoint strongly agrees that the CEC should require the third-party program implementer to design a streamlined application with only the necessary questions and documents required for submission. Minimizing the upfront burden of the application submittal process will encourage and enable the greatest number of school bus fleets to apply. As stated in the draft guiding principles, the number of questions and required documentation should be as minimized as possible so that all school districts, often agencies that have few resources or staff to devote to grant applications, can apply to the program.
- + ChargePoint recommends that the "adequate time" for applicants to complete their applications be at least 2-3 months so that school districts and other eligible entities have the time they need to prepare and submit their applications. With most school districts having limited resources to divert to pursuits not directly related to their day-to-day operations, it will be essential to offer them a generous period of time in which to submit their applications.



- + ChargePoint agrees that adequate customer service is integral to ensuring applicants' success in navigating the application and project implementation process. We would like to point to CEC's existing program, EnergiIZE, and its implementation team of CALSTART and Tetra Tech, as a successful example of how customer service can assist applicants with the incentive process. For EnergiIZE, the guidance provided by CALSTART and Tetra Tech has been critical to help program awardees navigate the multistep process. We recommend that similar customer service infrastructure be established for SB 114 funds to ensure applicants have adequate guidance to be able to leverage the program fully.
- + ChargePoint commends CEC for expecting the program implementer to expedite the reimbursement process for school districts. We further recommend that CEC consider a reimbursement process that allows school districts to request payment once invoices have been issued, and not necessarily only when invoices have been paid. This will help these districts to fully participate in the program even if they do not have the financial resources at hand to initially cover the upfront cost of all project activities.
- + ChargePoint recommends that CEC consider adding air quality considerations into prioritization of school district applicants. School district size, rural status, and percentage of unduplicated pupils are essential metrics of school district need, but other characteristics, such as air pollution concerns existent around school district boundaries, should also be factored in. Districts in poor air quality areas stand to benefit greatly from the zero-emission transportation options offered by clean school buses.
- + ChargePoint strongly agrees that SB 114 funds should be allowed to be stacked with other funding sources. We recommend that all local and federal sources of funding should be allowed, as well as all state programs that are not CEC-funded.

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 the contact information listed below if you have any questions or if we can provide additional information.

Sincerely,

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

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