

**DOCKETED**

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## **ChargePoint Comments on 23-TRAN-04 Military EV Chargers**

See attached comments

*Additional submitted attachment is included below.*



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December 21, 2023

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

**Re: Docket 23-TRAN-04, Military EV Chargers**

ChargePoint appreciates the opportunity to provide comments on the California Energy Commission's (CEC) proposed guidelines for 23-TRAN-04 Military EV Chargers. Focusing on deploying charging infrastructure for non-tactical government-owned military vehicles and privately owned vehicles with authorized access to military bases will help both federal and state military agencies begin their transitions to zero emissions and will improve air quality in the communities adjacent to such military facilities. We applaud the CEC for their efforts to prioritize the state's transition to zero-emission transportation by investing in projects 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, on multi-family properties, and for fleets. 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 CEC staff and hope our comments help design the most effective program possible.

- + ChargePoint recommends that the proposed \$7M in total funding be increased to allow for more projects to be funded, if possible. The average size of projects submitted under this program may be quite large in scope to meet the needs of both government-owned military vehicles and privately owned vehicles with authorized access to military bases, so an increase in total funding available would not only enable more projects to be funded, it would also allow for a greater number of large projects to have a chance to be awarded as well. This is crucial in a space that has thus far seen little attention from EV charging infrastructure programs (federal/state military agencies).
- + ChargePoint strongly recommends reconsidering the minimum required charger quantity per project. Charger quantities minimums (and maximums) should not be imposed so that greater flexibility can be granted to awarded projects. This is especially important for a program like this one, which will fund charging infrastructure not just for privately owned vehicles, but also government-owned fleet vehicles. No two fleets are exactly alike, and this diversity should be accommodated by allowing for projects of all sizes to submit an

application. The charging needs of one applicant may be vastly different from the charging needs of another, which means that setting minimums and maximums may unintentionally exclude some applicants from applying.

- + ChargePoint advises that the following project costs should be made eligible for reimbursement under this program:

- Network costs
- Commissioning

Network costs are necessary to enable access to the charging network for networked stations, which is needed to be able to provide important data collection abilities to measure project progress and successes. Network costs should be considered integral to the functional operation of the charging equipment. Additionally, commissioning is necessary for safe activation and operation of the charging infrastructure and likewise should be treated as a required activity for each project and thus reimbursable.

- + ChargePoint agrees that the program would benefit from a first-come first-served implementation style, but we suggest that additional applications should be reviewed more often than every 6 months after the initial solicitation. A cadence closer to every 3 months would be more effective for program implementation. This will allow for more projects to be funded in a given year and will encourage more applicants to apply, since they will know that the program administration timeline is not prohibitively lengthy.
- + ChargePoint cautions against weighing Team Qualifications & Experience so heavily in the scoring criteria. This is because many applicants may not have previous experience deploying charging infrastructure, and they should not be penalized for beginning their transition to zero-emission. We suggest that the “Innovation and Benefits” scoring criterion instead be awarded more points because unique projects and anticipated benefits brought to military facility-adjacent communities should be prioritized.
- + ChargePoint recommends that Level 2 and DC chargers of all power levels should be funded under this program. This relates back to our earlier comment that programs that fund charging infrastructure for fleets need to be flexible to accommodate the wide variety of fleet compositions and duty cycles. While some fleets may need very fast chargers to support their large EVs that have limited dwell time, other fleets may only need lower-powered Level 2 chargers to support their small EVs that have extended periods of dwell time. The diversity of these fleets should be celebrated, not stifled, and CEC should support fleets’ unique needs by allowing projects of many different scopes to apply.
- + ChargePoint advises that program-funded chargers should not be required to be publicly accessible 24/7 for both non-tactical government-owned vehicles and privately owned vehicles with authorized base/facility access. Instead, applicants should be able to decide how many hours each day that the chargers are available to privately owned vehicles, since their own fleet vehicles should have priority to charge to support their fleet operations. As stated previously, this type of flexibility is necessary for programs that



include funding for charging infrastructure for fleet vehicles, so this need should be reflected in the program guidelines.

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 black ink that reads "Claire Garcia".

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