

DOCKETED

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Comments of Charge Ahead Partnership Regarding NEVI Second Solicitation

Additional submitted attachment is included below.



March 25, 2024

Hannon Rasool
Director, Fuels and Transportation Division
California Energy Commission
Docket Unit, MS-4
Docket No. 22-EVI-05
715 P Street
Sacramento, California 95814

RE: National Electric Vehicle Infrastructure Formula Program

Director Rasool:

Charge Ahead Partnership, a coalition of businesses, associations and individuals that share the common goal of developing a charging network for electric vehicles (“EVs”) across the United States,¹ submits these comments in response to the California Energy Commission’s (the “Commission’s”) solicitation for written comment on the National Electric Vehicle Infrastructure Funding Program following the Joint Workshop on California National Electric Vehicle Infrastructure (NEVI) Formula Program Concepts – Second Solicitation.²

Drivers of gasoline-powered vehicles will only transition to EVs when they are confident that the fast-charging experience will be as safe, convenient, and reliable as their current refueling experience. These comments are intended to help California realize this objective as promptly and efficiently as possible.

Many of our corporate members, from big box retailers, to grocery stores and restaurants, to existing fuel retailers, own the real estate that is best suited for direct-current fast charging infrastructure or actively partner with those that do. Many of these businesses are located along highway corridors and offer the amenities that drivers will demand while refueling.³

¹ More information about the Charge Ahead Partnership is *available at* <https://www.chargeaheadpartnership.com/about>.

² See California Energy Commission, “Notice of Joint Workshop on California National Electric Vehicle Infrastructure (NEVI) Formula Program Concepts – Second Solicitation” (Feb. 29, 2024) *available at* <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=22-EVI-05>.

³ Many of our corporate members are already conveniently located alongside food and convenience vendors that drivers have come to expect while refueling. The prospect of pulling into a fast charger for 30 minutes to charge a vehicle without any ability to buy food or drinks is inconsistent with the existing consumer experience and will discourage consumers from purchasing EVs. Similarly, EV chargers should be located at facilities that have on-site employees whose job function includes calling law enforcement in the event of an emergency. Having close-by on-site amenities that are open 24/7 also enhances a location’s security by ensuring at least one person (an employee) is on-site in the event of an emergency. Such amenities that attract other travelers also minimize the chances of desolation (and

CAP has concerns with California's continued plan to divide the State into various corridor segments and provide awards to a single company within each respective segment. This approach will effectively preclude any businesses that do not have multiple locations or partnerships that are the appropriate distance from one another (and from highway exits) from competing for direct grant money within that segment, limiting potential applicants. While this approach may simplify the administration of funding, it does so at the expense of Californian EV drivers by keeping many potential NEVI grant applications out of the process, and by extension potentially out of the EV charging market.

Instead, CAP encourages an approach to NEVI solicitation that would see the Commission consider site-by-site applications fostering increased competition and innovation. This approach will allow for a more diverse pool of potential applicants, including small businesses that may have limited resources or locations who may have the desire and potential to be an outstanding NEVI grant recipient, but incapable of covering an entire corridor section. In addition to encouraging a more diverse pool of applicants, a solicitation approach that is not restricted to corridor segments will ensure that California can choose applicants with the best amenities. If California proceeds with a single vendor per corridor segment approach it will increase the likelihood of NEVI funded charging stations being co-located with less-than-ideal amenities as applicants could partner with locations lacking crucial elements to the consumer experience in order to ensure eligibility.

Congress designed the NEVI program to catalyze private investment in an EV charging network that Californians can rely on. California's current approach of awarding grants to just one company in every corridor segment will undermine that objective. CAP represents hundreds of California businesses, many of whom already possess, or partner with entities that possess, the most attractive real estate for EV charging infrastructure. Many of these members can, and will, provide the charging experience Californians desire and are interested in applying for NEVI funds. We are happy to serve as a resource for the Commission as you continue to implement the NEVI Program and thankful for this opportunity to comment.

Sincerely,

/s/ Jay Smith

Jay Smith

Executive Director

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thus vulnerability) for EV drivers while they recharge. Co-locating charging stations with 24/7 amenities means that EV drivers will invariably be more comfortable purchasing an EV without concern of exposing themselves to undue safety risk during on-the-go refueling events.