

**DOCKETED**

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*Comment Received From: Electric Vehicle Charging Association  
Submitted On: 3/25/2024  
Docket Number: 22-EVI-05*

## **EVCA Comments on NEVI Program Design**

*Additional submitted attachment is included below.*



March 25, 2024

California Energy Commission  
715 P Street  
Sacramento, CA 95814

**Re: Docket No. 22-EVI-05 – Comments In Response to Joint Workshop on California’s NEVI Formula Program**

On behalf of the Electric Vehicle Charging Association (EVCA), we appreciate the opportunity to provide comments on the Joint Workshop regarding California's National Electric Vehicle Infrastructure (NEVI) Formula Program. EVCA is a not-for-profit trade organization of 22 leading EV charging industry member companies and two zero-emission autonomous fleet operators. The association was established in 2015 to comprehensively represent the entire EV charging value chain and provide a collective industry voice for decision-makers in California.

As an association representing businesses committed to promoting electric vehicle (EV) adoption and the development of a robust charging infrastructure, we commend the state's efforts to advance the NEVI program and support the widespread deployment of direct current fast charging (DCFC) stations. EVCA respectfully recommends the following considerations for the upcoming NEVI solicitation:

**1. Release All Remaining NEVI Corridor Groups:** To accelerate the buildout of corridor charging infrastructure, we encourage the release of all remaining corridor groups in the next solicitation. This approach will expedite the implementation of NEVI-supported projects and align with California's ambitious decarbonization and air quality goals.

**2. Enhance Program Flexibility:** While we understand the intent behind requiring applicants to complete both high-ranked and low-ranked corridor groups, this approach may inadvertently create barriers to deployment. EVCA recommends avoiding binding requirements that bundle multiple charger locations into a single contract or award, as this requirement can present significant challenges, particularly for smaller EV charging service providers.

Instead, we recommend structuring a bidder-inclusive approach to allow individual applicants to propose charging stations site-by-site along specific corridors or

segments. This approach aligns with successful incentive programs like CALeVIP 2.0 and encourages broader participation from experienced charging providers, fostering increased competition and innovation. Furthermore, we suggest considering incentives or scoring rubrics that encourage, but do not require, applicants to propose multiple locations within a corridor group. This strategy has been effectively implemented in other states, such as Texas, Colorado, and Utah, and can facilitate the development of convenient, accessible corridor charging stations.

A site-by-site location approach enables the development of a vibrant EV charging ecosystem, by encouraging a diverse pool of applicants to prepare for and develop charging locations. Site-by-site applications further encourage local, small, disadvantaged, minority, and women-owned and operated businesses to provide charging services and promote competition which can lower costs to drivers. It also encourages business model innovation and piloting of new EVSE services and customer experiences.

In addition to encouraging a more diverse pool of applicants, a site-by-site bidding approach will also enable the state to choose the best proposed site locations with the strongest amenities as opposed to needing to settle for whatever site a single bidder was able to secure across the required corridor locations. A site-by-site approach may also allow for quicker deployment of chargers throughout the state, allowing awarded applicants to move forward quickly on sites that are ready for energization as opposed to attempting to synchronize development across entire corridors.

If California is opposed to a site-by-site bidding approach, EVCA suggests determining a minimum number of sites that the state will consider in an application (e.g. 3 to 5 sites) and using that as the condition for bundles, as opposed to requiring all of the sites to be contiguous, located along a single corridor. This will allow flexibility for applicants to propose sites that are best suited to their businesses while still providing the state with the advantage of a smaller number of contracting partners.

By embracing program flexibility and drawing upon best practices from other states, California can enhance the efficiency and effectiveness of its NEVI program, ensuring a seamless transition to electric transportation for all Californians.

We appreciate your consideration of these recommendations and remain committed to collaborating with the state to achieve our shared goals of a more convenient and electric transportation future.

Respectfully,

Reed Addis  
Governmental Affairs  
Electric Vehicle Charging Association