

**DOCKETED**

<b>Docket Number:</b>	22-EVI-05
<b>Project Title:</b>	National Electric Vehicle Infrastructure (NEVI) Funding Program
<b>TN #:</b>	255256
<b>Document Title:</b>	ABB E-mobility Comments - ABB E-mobility Comments on California's NEVI Solicitation Concepts
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	ABB E-mobility
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	3/25/2024 3:30:13 PM
<b>Docketed Date:</b>	3/25/2024

*Comment Received From: ABB E-mobility  
Submitted On: 3/25/2024  
Docket Number: 22-EVI-05*

## **ABB E-mobility Comments on California's NEVI Solicitation Concepts**

*Additional submitted attachment is included below.*

March 25, 2024

California Energy Commission  
Fuels & Transportation Division  
715 P Street  
Sacramento, CA 95814

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

Dear California Energy Commission and California Department of Transportation staff,

ABB E-mobility is pleased to provide the following submission to the California Energy Commission (CEC) and the California Department of Transportation (Caltrans) in response to Docket No. 22-EVI-05 relating to the Joint Workshop on California’s NEVI Formula Program.

ABB E-mobility has been manufacturing EV chargers for the US market for over a decade and is the leading manufacturer of electric vehicle chargers globally, having sold more than 1 million electric vehicle chargers, including 50,000+ direct current fast chargers (DCFC). ABB E-mobility has been manufacturing EV chargers in the US since 2019 and beginning in early 2023, expanded US manufacturing operations, in part, to meet Build America, Buy America Act requirements. ABB E-mobility can produce up to 10,000 chargers per year, ranging from 20kW to 600kW in power, meeting the needs of public charging, transit and school buses, medium- and heavy-duty vehicles, and fleets of all kinds.

ABB E-mobility provides charging technology to owners and operators of charging equipment across the transportation sector including public charging networks, transit bus operators, electric utilities, auto dealerships, auto manufacturers, shipping and logistics fleets, commercial fleets, and more. As a long-time member of the e-mobility industry, ABB E-mobility is actively involved in developing not only charging technology, but also industry-wide standards for both hardware and software interoperability.



*Figure 1. ABB E-mobility public charging references*

ABB E-mobility has a robust service and maintenance operation providing 24/7/365 monitoring, troubleshooting, and repair services for chargers in the field. With our focus on



developing, manufacturing, and delivering innovative and reliable charging technologies to the market, ABB E-mobility primarily provides charging owners and operators with the technology needed to deliver seamless and high-quality charging experiences.

### **Improve Flexibility in the Corridor Group Framework & Proposed Two-Part Projects**

ABB E-mobility appreciates California's efforts to quickly deploy NEVI funding and is supportive of the proposed release of all remaining NEVI corridor groups in the next funding solicitation. However, ABB E-mobility cautions against requiring applicants to complete entire corridor groups, or both a high-ranked and low-ranked corridor group, as this approach will inadvertently create barriers to deployment. Binding requirements that bundle multiple charger locations into a single contract or award presents 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. 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.

A site-by-site approach aligns with successful incentive programs like CALeVIP 2.0 and encourages broader participation from experienced charging providers, fostering increased competition and innovation. ABB E-mobility recommends that the CEC and Caltrans consider 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.

While the corridor group approach may allow for seemingly simpler contracting up front, it has significant tradeoffs, including limiting the ability of the CEC and Caltrans to choose the best possible site locations with the strongest driver amenities. At this stage in EV adoption, we need to provide drivers with the best and most convenient charging experiences possible, and the quality of that experience is heavily impacted by site location and onsite amenities. A site-by-site approach allows for sites to be scored more competitively as opposed to needing to settle for whatever site a single bidder was able to secure across the required corridor locations. Additionally, 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, ABB E-mobility 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 CEC and Caltrans 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.

\*\*\*\*\*

Thank you for the opportunity to provide comments on California's deployment of the National Electric Vehicle Infrastructure Program. ABB E-mobility shares California's commitment to electrifying the transportation sector and creating US jobs and economic growth in the process.

If you have any questions or want to discuss any of these topics further, please do not hesitate to reach out to Alex Ehrett, Public Policy & Market Development Manager, at [alex.ehrett@us.abb.com](mailto:alex.ehrett@us.abb.com).

Respectfully submitted,

A handwritten signature in black ink that reads "Alex Ehrett". The signature is written in a cursive, flowing style.

Alex Ehrett  
Public Policy & Market Development Manager, West Region  
ABB E-mobility