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Electric Era Comments on CEC's Proposed Structure for Second NEVI Round

Additional submitted attachment is included below.

Docket Number: 22-EVI-05

March 25, 2024

Electric Era Technologies, Inc.
3257 17th Ave W, Suite 101
Seattle, WA 98119

Dear CEC,

Thank you for the opportunity to provide comments on the proposed structure and requirements for the second California NEVI grant funding opportunity.

Introduction

Electric Era is a Seattle-based company providing intelligent battery-backed DCFC systems that are specifically designed to address the industry's persistent reliability issues and to minimize impact on our nation's overburdened grid.

Our patented, fully integrated charging system – called PowerNode – combines power from the grid with power from our battery energy storage system (BESS) to provide charging power beyond the grid's limit. PowerNode also manages grid demand, reduces operating costs (including by minimizing demand charges), and remotely detects and recovers from station errors or faults.

Electric Era partners with site hosts of all shapes and sizes, from larger enterprise companies to smaller mom-and-pop stores, to install and maintain NEVI-compliant charging stations.

NEVI Program Structure

Our comments are focused on 1) ensuring an equal playing field and 2) allowing smaller and younger businesses to participate in California's NEVI program:

As the CEC is aware, California's first NEVI grant funding opportunity was unique among all other states. First, it required applicants to apply for at least one entire corridor with multiple sites and, frequently, dozens of new ports. Second, it required a 50 percent minimum cost share, well beyond the federal government's willingness to cover up to 80%. Third, it allowed only "experienced contractors" to apply.

Taken altogether, these program elements could potentially create an unfair advantage for the largest corporations with the deepest pockets, at the expense of smaller or younger EVSE providers and site-host businesses – regardless of their capabilities or technologies. Unfortunately, the CEC's proposed structure for the second opportunity seems to be doubling down on this approach.

Smaller EVSE companies and site-host businesses should not be precluded from NEVI funding opportunities, just because they lack the physical footprint or capital to simultaneously develop multiple sites across multiple corridors. Many site-host businesses are individually owned, including by members of immigrant and minority communities, and their ability to develop or host a NEVI charging station should be considered equally alongside corporate-owned sites. Similarly, smaller EVSE companies that are fully capable and resourced to provide, install, and/or maintain NEVI-compliant charging stations should not be precluded from having a chance to compete, just because they lack the sheer number of physical sites or amount of capital required to simultaneously develop dozens of stations.

We would also like to note that the EV charging industry is still relatively nascent, with new technologies, approaches, and players emerging on a regular basis. In a rapidly evolving industry that is still in flux, a company's age and size should not prevent its eligibility to be considered. Instead, a company's age and size should be considered alongside an applicant's capabilities and offerings, especially when new solutions and new providers are needed to increase reliability and accessibility.

Suggestions

1) Allow applicants to propose individual sites for NEVI funding consideration, instead of requiring applicants to propose multiple sites across two or more corridors.

- The CEC could instead award additional points for applicants that submit multiple sites along one or more corridors.

2) Allow younger and smaller EVSE companies and site-host businesses to apply, instead of requiring applicants to meet its definition of "experienced contractor."

- The CEC's preference for larger and older companies can be provided via scoring instead of preventing smaller or newer companies from applying altogether.

3) Allow applicants to cover as little as 20 percent of eligible project costs, instead of requiring a 50-percent minimum.

- The CEC could instead list the range of scores that would be assigned to an application based on the percentage cost share committed, with higher scores awarded to those committing to 50 percent.

Conclusion

Evaluating an applicant's qualifications and capabilities should not be based on the size of their corporate real-estate portfolio and bank account. Instead, just as nearly all other states have been doing, California could ask the questions and require the documentation necessary on the front end to evaluate and then make sure to hold selected vendors accountable for what they are required to do.

When the need for reliable EV fast-charging stations in California is so great – 2 million by 2035 – we believe that the CEC should welcome more partners to help build stations and welcome newer companies that may bring different technologies and solutions.

Thank you again for the opportunity to provide comments. Please do not hesitate to reach out should you have any questions or if we could be of further assistance.

Sincerely,

Brian Kyuhoon No
Head of Government Affairs
Electric Era Technologies, Inc.