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## **EVgo Comments on Joint Workshop on California's NEVI Program**

*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**

EVgo appreciates the opportunity to submit comments on the California Energy Commission’s (CEC) and Caltrans’ Joint Workshop on Concepts for the Second Solicitation under California’s National Electric Vehicle Infrastructure (NEVI) Formula Program. As one of the nation’s largest public fast charging providers, EVgo recognizes that a convenient, widespread EV charging network is crucial for mass scale EV adoption needed to help achieve California’s energy, decarbonization, and air quality goals.<sup>1</sup> NEVI supports these goals by bolstering California’s public direct current fast charging (DCFC) network and making it easier for all Californians to confidently transition to electric transportation. To further enhance and improve success of the program, EVgo respectfully recommends that CEC and Caltrans:

1. Release the remaining corridor groups in the next NEVI solicitation to accelerate deployment of corridor charging;
2. Avoid requiring applicants to fully build out corridor groups and instead consider encouraging individual applicants to build multiple charging stations in a corridor group, enhancing the competitive nature of the program; and
3. If the two-part project concept is adopted, allow for simultaneous construction of high-ranked and low-ranked corridor pairs.

First, EVgo appreciates the CEC and Caltrans’ proposal to open the remaining corridor groups in a second solicitation. The NEVI program remains a critical complement to state funding for EV charging, and accelerating its implementation will support California’s ambitious yet achievable goal of building a widespread DCFC network that drives EV adoption.

In its presentation, the CEC and Caltrans proposed a new two-part project structure that would require applicants to complete at least one high ranked and one low ranked corridor group. While EVgo understands the CEC’s intent to accelerate the deployment of NEVI-supported charging infrastructure with this proposal, EVgo respectfully asserts that this proposed requirement adds further complexity to California’s NEVI program and may result in slower buildout of charging stations if CEC does not receive a sufficient number of qualified applications. Proposing to release all remaining corridor groups in one solicitation further magnifies the challenge of putting together complete corridor applications.

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<sup>1</sup> <https://www.energy.ca.gov/publications/2024/assembly-bill-2127-second-electric-vehicle-charging-infrastructure-assessment>

In its 2022 comments on CEC and Caltrans joint pre-solicitation workshop, EVgo<sup>2</sup>, CalETC<sup>3</sup>, EVCA<sup>4</sup>, recommended against grouping – or “bundling” – multiple charger locations along an entire corridor into a single contract or award for funding. Other commenters similarly expressed concern about the size of the projects that would be required under the CEC’s proposed corridor groups as a barrier to deployment.<sup>5</sup> Requiring applicants to secure many sites – often in remote locations – for a single project presents significant challenges that may inhibit the speed and success of California’s NEVI program. In contrast, CALeVIP 2.0 and other successful CEC incentive programs for DCFC stations do not require bundling, and applicants can apply for individual sites that best align with their business needs.

Further, California NEVI’s bundling requirement is also an outlier among other states that have already completed NEVI solicitations: of the 31 other states that have opened or completed competitive NEVI funding solicitations, none of them have required applicants to bid on entire corridors.<sup>6</sup>

By creating an open solicitation for applicants to submit individual charging locations along a set of corridors, CEC and Caltrans can enhance competition and enable a wider array of experienced charging providers to develop convenient, accessible corridor charging stations.

At a minimum, EVgo recommends that CEC’s NEVI scoring rubric be adjusted to encourage – but not require – applicants to propose multiple locations in a corridor group. For example, Colorado provided an enhanced incentive for applicants that proposed at least three sites along an Alternative Fuels Corridor<sup>7</sup> and Utah awarded additional points in its scoring rubric to applications that voluntarily included multiple sites.<sup>8</sup>

Finally, if CEC and Caltrans ultimately adopt the two-part project proposal, EVgo encourages the agencies to enable applicants to develop low-ranked corridors at the same time as high-ranked corridors as opposed to waiting for some level of progress on a high-ranked corridor before allowing construction of low-ranked corridors to commence. The CEC’s proposal to stagger corridor group development fundamentally works against its goal of enabling more efficient, agile deployment of charging infrastructure.

Moreover, artificially delaying the construction of lower-ranked corridor groups augments the risk that project costs will increase, project permits expire, and scarce grid capacity becomes unavailable. EVgo encourages CEC to reconsider its proposal to ensure that lower ranked corridors can be developed in a timely, efficient manner.

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<sup>2</sup> <https://efiling.energy.ca.gov/GetDocument.aspx?tn=246253&DocumentContentId=80435>

<sup>3</sup> <https://efiling.energy.ca.gov/GetDocument.aspx?tn=246252&DocumentContentId=80436>

<sup>4</sup> <https://efiling.energy.ca.gov/GetDocument.aspx?tn=246245&DocumentContentId=80431>

<sup>5</sup> <https://efiling.energy.ca.gov/GetDocument.aspx?tn=246254&DocumentContentId=80434>

<sup>6</sup> [2024 Q1 NEVI Progress Update · Joint Office of Energy and Transportation \(driveelectric.gov\)](https://drive.google.com/file/d/1-7nvsZb13xIGS5F6sD169U3XFleqZTA/view)

<sup>7</sup> <https://drive.google.com/file/d/1-7nvsZb13xIGS5F6sD169U3XFleqZTA/view> at 25.

<sup>8</sup> [https://drive.google.com/file/d/1ZtXTv5QbV1QzUe08xpuD0KV\\_JRHcXxGJ/view](https://drive.google.com/file/d/1ZtXTv5QbV1QzUe08xpuD0KV_JRHcXxGJ/view) at 20.

EVgo looks forward to being a resource to CEC and Caltrans as NEVI implementation continues. By taking best practices from other states and enhancing program flexibility, California can improve program efficiency in a manner consistent with state and federal EV adoption goals.

Respectfully submitted this 25th Day of March,

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