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ChargePoint Comments on 24-EVI-01 West Coast Truck Charging and Fueling Corridor Project

See attached comments.

Additional submitted attachment is included below.

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California Energy Commission
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ChargePoint Comments on 24-EVI-01: West Coast Truck Charging and Fueling Corridor Project Funding Concepts

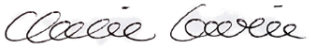
Dear California Energy Commission and Caltrans staff,

ChargePoint, Inc. (ChargePoint) respectfully submits these comments in regards to the California Energy Commission (CEC) and Caltrans webinar on the design of the upcoming solicitation for Charging and Fueling Infrastructure (CFI) program funds awarded to the states of California, Oregon, and Washington.

We applaud CEC, Caltrans, the Oregon Department of Transportation, and the Washington State Department of Transportation for their leadership to reduce emissions from the trucking industry through buildout of publicly accessible charging infrastructure along priority corridors and in areas of high goods movement activity along the west coast. ChargePoint appreciates the chance to provide feedback to assist CEC and Caltrans in creating implementation strategies for this essential forthcoming program to deploy publicly accessible charging infrastructure for medium- and heavy-duty zero-emission vehicles in California and beyond.

Thank you for the opportunity to submit this response. We look forward to continued collaboration with CEC and Caltrans on the development of guidelines and implementation of the resulting program to reduce carbon emissions through the continued electrification of California's transportation sector.

Sincerely,



Claire Garcia
Fleet Grant Development Manager
ChargePoint, Inc.

Background, ChargePoint:

Founded in 2007, ChargePoint is a leading global electric vehicle charging network headquartered in Campbell, California. To date, we have delivered 295 million charges, thus enabling 12.9 billion electric miles and avoiding 499 million gallons of gasoline. At ChargePoint, EV charging is all we do, and we do it all. Passenger cars, delivery vehicles, buses, and more—we charge any EV, anywhere it goes. We have built a fully integrated portfolio of hardware, cloud services and support with the best technology in the industry. We offer solutions for home, government, multi-family, commercial, and fleet electric vehicle charging infrastructure. Additionally, ChargePoint has successfully deployed both level two and fast charging infrastructure along major highway corridors and within communities across the country while working in tandem with industry and government to enable a more accessible electric future.

ChargePoint's hardware offerings include AC or Level 2 and DC fast charging (DCFC) products, and ChargePoint provides a range of options across those charging levels for specific use cases including light duty, medium duty, and transit fleets, multi-unit dwellings, residential (multi-family and single family), destination, workplace, and more. ChargePoint's software and cloud services enable EV charging station site hosts to manage charging onsite with features like access control, charging analytics, and real-time availability. With modular design to help minimize downtime and make maintenance and repair more seamless, all products are UL-listed, and CE (EU) certified, including ENERGY STAR® certified options across both our AC and DC product portfolios.

ChargePoint's primary business model consists of selling smart charging solutions directly to businesses and organizations and offering tools that empower station owners, or site hosts, to deploy EV charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven, cloud-enabled capabilities that enable site hosts to better manage their charging assets and optimize services. For example, with those network capabilities, site hosts can view data on charging station utilization, frequency and duration of charging sessions, set access controls to the stations, and set pricing for charging services. These features are designed to maximize utilization and align the EV driver experience with the specific use case associated with the specific site host. Additionally, ChargePoint has designed its network to allow other parties, such as electric utilities, the ability to access charging data and conduct load management to enable efficient EV load integration onto the electric grid.

Comments

+ ChargePoint agrees with CEC's and Caltrans' proposed solicitation timeline to open the solicitation in April of this year and close it in August, giving applicants enough time to prepare thorough applications. There have been solicitations released in the past that did not give adequate time for applicants to prepare competitive applications in response to requests for complex projects (for example, only 2 months), and this timeline is much more reasonable, especially considering CEC's and Caltrans' preference for "shovel ready" projects that have secured permits in hand and CEQA/NEPA reviews completed.

+ We agree that all sites should be required to have adequate lighting and restrooms and also recommend adding a requirement that all sites be suitable for medium- and heavy-duty (MDHD) vehicles in particular in terms of size and layout. For example, eligibility criteria for project locations should require sites to be of adequate size to accommodate MDHD vehicles, including the largest kind (Class 8) that may have trailers. Such vehicles require more space to maneuver and a larger turning radius than smaller electric vehicles (EVs) that have been the focus of recent public charging corridor grant programs. The increased height of MDHD vehicles must also be considered; for sites having or proposing to have canopies, consideration must be given to the height of the canopy so as to allow the largest vehicles, including those pulling trailers, to access the charging site. Charging stalls must be designed to accommodate vehicles with heavy loads by including pull-through stalls that make it easier for large vehicles to exit a charging station without needing to reverse and potentially block incoming traffic.

+ ChargePoint recommends increasing the minimum per port power level from 150 kW to accommodate the large battery capacities of electric trucks. A minimum power level of 200 kW or greater may be more suitable for larger EVs, whose battery packs, on the higher end, can be upwards of 750 kWh. Even with 200 kW stations, charging a truck of this size would still take a few hours. With this in mind, we agree with CEC's and Caltrans' strategy to require make-ready for at least one MW charger per site. ChargePoint is already integrating the Megawatt Charging System (MCS) into its existing portfolio of Express Plus Power Link 2000 products. Initially, MCS will deliver up to 1.2 Megawatts. It will also support bi-directional charging and will enable output of up to 3 megawatts in the future before vehicles capable of accepting such charge are available. ChargePoint is already conducting interoperability testing now to implement a seamless MCS deployment. This system will help support the electrification of EVs with the largest battery packs, such as Class 8 trucks.

+ We agree with CEC and Caltrans requiring SAE-standardized connectors and recommend requiring chargers to offer flexible connector options to accommodate EVs with various charging port standards. For example, the ChargePoint® Omni Port solution ensures any EV can charge in any parking space, regardless of its connector type and without an expensive additional cable or adapter. Omni Port ensures public charging ports are future-ready and designed to support vehicles that are already on the road as well as EVs coming to market.

Omni Port also eliminates the hassle of carrying adapters while forming a simpler, more convenient charging experience.

+ ChargePoint also recommends requiring applicants to outline an anti-vandalism plan for installed charging infrastructure at proposed project sites. As vandalism and theft of charger parts becomes more common, it is more critical than ever before to ensure that valuable publicly funded infrastructure is protected. For example, ChargePoint currently leads the way in solving EVSE industry challenges with innovative vandalism prevention solutions. We have developed cut-resistant cables using proprietary, patent-pending technology to mitigate the growing issue of theft. Additionally, ChargePoint® Protect offers advanced real-time protection by detecting cable cutting, triggering audible and visual alarms, and notifying station owners via SMS and email. These features work together to minimize repair costs, reduce downtime, and safeguard charging equipment. We are committed to providing the best charging experience for drivers, ensuring long-term reliability and peace of mind for drivers and charging site hosts alike.

+ With regards to CEC's and Caltrans' discussion questions at the end of the webinar, we recommend referring to CEC's successful CRITICAL PATHS program for inspiration in designing this upcoming solicitation; for example, informing questions related to charging station distance from other stations, project locations, minimum power levels, minimum required amenities, and other characteristics.

+ With regards to CEC's and Caltrans' question on charger reservation systems, we recommend that chargers be waitlist-capable. ChargePoint chargers already feature waitlist capabilities, with the ability to be used by any driver. Drivers planning to charge at a specific station can join a waitlist to reserve their place in line if there are multiple drivers waiting their turn to charge. Once the charger becomes available to the driver, they will be notified and have 15 minutes to begin their charging session. If they decide not to move forward with their charging reservation within those 15 minutes, then the station becomes available to the next waiting driver. This system helps manage charger availability when demand is high.