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bp pulse comments for Docket 24-EVI-01

Additional submitted attachment is included below.

February 19, 2025

California Energy Commission
Docket: 24-EVI-01
715 P Street
Sacramento, California 95814
Project: U.S. Department of Transportation Charging and Fueling Infrastructure Program; CFI West Coast Truck Charging and Fueling Corridor Project

Company Overview

bp pulse is the global electrification and charging solution brand for bp. bp pulse U.S. operates within the legal entity BP Products North America Inc. (interchangeably referred to herein as "bp pulse" and "bp"). The ultimate parent company of BP Products North America Inc. is BP p.l.c. The direct parent of BP Products North America Inc. is The Standard Oil Company. bp pulse launched in 2018 with the acquisition of Chargemaster Ltd in the United Kingdom (UK). With the backing of bp's expertise in the energy sector as an integrated energy company, as well as our strong brand presence and extensive resources, bp pulse has already become a global leader in EV charging solutions. Today, bp pulse is the largest public EV charging network in the UK and continues to expand across Europe, China, Australia, and the U.S. Over the last 6 years, bp pulse has continued to evolve our offer and has built a global network of more than 35,700 publicly available charge points around the world, which includes hundreds of public charging locations across the globe designed to give drivers a convenient, safe, and reliable charging experience.

bp pulse entered the U.S. market in 2021 after the acquisition of Amply Power. bp pulse's U.S. headquarters is in Chicago, IL. Our legacy is rooted in developing, operating, and maintaining customer-centric solutions through our network of more than 8,000 retail fuel locations in the U.S. bp retail fuel locations span several brands, including: bp, Amoco, ampm, Thorntons, and TravelCenters of America (TA). Operating in 44 states, bp focuses on unlocking the full potential of its assets and workforce. For more detailed insights, explore bp's operations in key regions through an interactive map by **clicking here**.

Recommendations

bp pulse appreciates the opportunity to provide formal recommendations regarding the deployment of the Community Fueling and Infrastructure Tri-State award. We respectfully propose the following:

1. Site Scope Recommendation – bp pulse recommends a six-port configuration instead of the suggested eight-port configuration. This approach ensures strategic deployment that is cost-effective, scalable, and aligned with demand.

Rationale:

a. Site Feasibility & Space Constraints – Many sites, especially in urban or constrained areas, may not have the space to accommodate eight charging ports without significant site modifications or

added costs. A six port configuration allows for optimal use of available space while maintaining high charging capacity.

b. Infrastructure & Power Considerations – Some sites may face power supply limitations, and adding more ports could require costly upgrades. A six port configuration ensures a balance between power availability, grid capacity, and efficient site deployment.

c. Phased Expansion Flexibility – A six port configuration provides a strong baseline while allowing room for future expansion as demand grows, rather than overbuilding upfront and risking underuse. This approach ensures strategic deployment that is cost-effective, scalable, and aligned with demand.

2. Geographic Focus Recommendation

Prioritize the deployment of charging infrastructure in Northern California.

Rationale:

a. High Traffic Demand: Northern California experiences significant MHD freight traffic. Expanding fast-charging infrastructure in this region will improve reliability and accessibility for MHD EV users.

b. Regional and Economic Impact: Strengthening charging networks in Northern California enhances connectivity between urban centers, rural areas, and neighboring states, potentially supporting regional mobility and economic activity.

c. Infrastructure Gaps: There are existing gaps in fast-charging coverage across Northern California. Targeting these gaps will potentially help promote access to EV infrastructure and align with California's broader clean transportation goals.

Conclusion

bp pulse's experience in delivering innovative charging solutions positions us to meet the evolving needs of the transportation sector. We believe that prioritizing high-traffic corridors and scalable solutions will drive significant benefits for EV users.