

DOCKETED

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ChargePoint Comments on Title 20 EVSE Data

Additional submitted attachment is included below.



ChargePoint, Inc.

254 East Hacienda Avenue | Campbell, CA 95008 USA
+1.408.841.4500 or US toll-free +1.877.370.3802

October 17, 2016

Malachi Weng-Gutierrez, Technical Lead
California Energy Commission
1516 9th Street
Sacramento, CA 95814

RE: General Rulemaking Proceeding for Developing Regulations, Guidelines and Policies for Implementing SB 350 and AB 802: Title 20 Data Collection Regulations – Electric Vehicle Service Equipment Information (Docket 16-OIR-01)

Dear Malachi Weng-Gutierrez,

ChargePoint has significant concerns with the Title 20 Data Collection Regulations Proposed Language for Discussion presented at the September 26, 2016 Staff Workshop. Our comments are specific to pages 51-53 on Electric Vehicle Service Equipment (EVSE) information.

Section (g)(1) on page 51 provides a list of information required to be reported by an EV charging station or its designee, which could presumably be the network operator for the charging station. ChargePoint has several concerns about this section.

In 2013, the Electric Vehicle Charging Stations Open Access Act (SB 454) was signed into law requiring the following data collection:

44268.2 (b) The service provider of electric vehicle service equipment at an electric vehicle charging station or its designee shall disclose to the National Renewable Energy Laboratory the electric vehicle charging station's geographic location, a schedule of fees, accepted methods of payment, and the amount of network roaming charges for nonmembers, if any.

This information is available to the public on the [Alternative Fuels Database](#), operated by the US Department of Energy. The database is updated daily through an API. This daily update reflects new information when a new public charging station is activated. ChargePoint would encourage the CEC to use this database as a source for some of the data proposed to be collected under (g)(1) of the Proposed Language for Discussion. The API developed to submit information to the Alternative Fuels Database could be sent to the CEC directly if necessary. Reporting through an API allows for batches of data to be submitted which eases the burden on EVSE operators to report on thousands of stations.

ChargePoint objects however to requiring additional data beyond the SB 454 requirements to be submitted under Title 20. We are concerned with the following proposals in (g)(1):

(V) type of on-site renewable power generation, if application

Comment: This is an attribute of the site which would not be known or reportable by the EVSE network operator. For example, we may not know if the site has solar panels installed on their roof, especially not if the installation occurs after the stations are installed.

(X) for planned stations, the data the station is expected to be available for charging

Comment: This would be difficult to predict or report. In many cases, the station owner establishes pricing policies and access controls at the same time that the stations are turned on.

(Z) type of organization that owns infrastructure

Comment: This is subjective information. How is the "type" of organization defined?

(AA) description of who is allowed to access the station (e.g. public, fleet, key card)

Comment: The data proposed for collection here should only be required for public charging stations. For security reasons, ChargePoint would object to requiring owners of private charging stations (including behind-the-fence fleet charging and private workplace charging) to publicly disclose the locations of their charging stations.

(CC) the end date for the reported station location data (if station is closed)

Comment: If the data is being submitted via API then a station that closes would simply drop from the list of active stations.

Section (g)(2) on page 52 states that multiple submittals shall be provided during the year if changes are made to the station. Again, ChargePoint strongly encourages the CEC to adopt the practices established under SB 454 and the National Renewable Energy Laboratory and instead collect this data via API. Requiring separate submissions for every port and every single change is onerous to both the charging station owners, the network providers, and the Commission to review. In order to ensure the most up-to-date information, an automated API should be used.

Section (g)(3) on page 52 requires status, operational and billing information to be provided to the CEC. We object to this section entirely. First, this section appears to add requirements to networked charging stations that would not be required on non-networked charging stations. Secondly, it is unclear how this information is defined. If a station is temporarily offline for example, would the station owner have to immediately contact the CEC? Thirdly, it is unclear how "billing" is defined. ChargePoint objects to any requirement that a charging station owner disclose their revenue or cost to the station owner for network fees. Finally, ChargePoint opposes any requirement that CEC has direct access to this data via "a standardized application program interface" or cloud-based data program. This data is owned by the station owner and/or by the network operator. Providing this access free of charge to the CEC devalues the data and services provided by EVSE companies.

Section (g)(4) on page 53 requires hourly consumption, hourly peak load, charging start time, charging duration, and maximum charging rate to be reported to the CEC. ChargePoint is opposed to this requirement entirely. This is competitive information that would threaten the entire charging station industry if required to be disclosed. Highly utilized sites may indicate a need to install more charging stations and this data could lead to competitors (or utilities with their own EV charging pilots) swooping in to upsell a customer. It is unclear why the CEC feels this data is necessary and what it intends to do with this information.

Section (g)(5) on page 53 requires a report of the hourly combined peak of all charging sessions for each hour of the year. This is an unnecessary and onerous requirement. While we cannot prevent utilities from disclosing their own meter data to the CEC, ChargePoint is opposed to requiring charging station owners to disclose any information on utilization that could threaten the competitive EV charging market.



ChargePoint is very concerned about these data reporting requirements proposed in this draft document. We also feel that the CEC should have notified all participants in the SB 350 workshops being held at the CEC and the CPUC that this rule was being developed as there is significant overlap on what data is collected under the utility programs. Overall, these requirements seem onerous, unnecessary, and threatening to competition. We look forward to working with the CEC to amend this proposal and develop rules that support the EV charging industry.

Headquartered in Campbell, California, ChargePoint is the world's largest and most open EV charging network with more than 30,800 level 2 and DC fast charging spots, including more than 15,700 spots in California. Every 5 seconds, a driver connects to a ChargePoint station and by initiating over 18.9 million charging sessions, ChargePoint drivers have driven over 447 million gas free miles.

Thank you for considering our concerns.

Sincerely,

A handwritten signature in black ink that reads "Anne Smart". The signature is fluid and cursive, with the first name "Anne" and last name "Smart" clearly distinguishable.

Anne Smart
Director, Government Relations and Regulatory Affairs
ChargePoint