

DOCKETED

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November 1, 2016

Commissioner Janea A. Scott
California Energy Commission
1516 9th Street
Sacramento, CA 95814

RE: Incorporating Transportation Electrification in Publicly Owned Utility Integrated Resource Planning (Docket No. 16-TRAN-01)

Dear Commissioner Scott,

ChargePoint appreciates the opportunity to submit written comments after the October 5 Lead Commissioner Workshop RE: Publicly Owned Utility Integrated Resource Planning. Headquartered in Campbell, California, ChargePoint is the world's largest and most open EV charging network with more than 31,000 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.

SB 350 requires POUs to include procurement for transportation electrification in their integrated resource planning (IRP) by January 1, 2019. This law, along with other complimentary state policies including the Governor's goal of 1.5 million ZEVs by 2025, presents an opportunity for POUs to develop and propose programs to incentivize the installation of electric vehicle charging infrastructure.

At the October 5 Lead Commissioner Workshop, several POUs and other stakeholders presented on existing or proposed EV charging station pilots. ChargePoint would like to offer additional comments on how future investments should be structured to support a competitive market and successful infrastructure deployment.

I. Investment Areas

In order to promote EV adoption, ChargePoint recommends that utility investments be directed to multifamily housing, residential charging, workplace, fleet electrification, and public charging stations including public fast charging.

Multifamily

Multifamily housing continues to be an underpenetrated market due to the challenges of incentivizing landlords to invest in the installation of charging infrastructure for tenants that may eventually move.

Residential

Residential charging, specifically L2 residential charging stations, could provide future grid benefits if the utility invests in or incentivizes residents to purchase networked, demand response-capable stations.

Workplace

Workplace charging has been found to have a “halo effect” towards EV adoption. The [US Department of Energy](#) has found that employees of workplaces that offer EV charging are 20 times more likely to get an EV than employees of workplaces that do not offer EV charging.

Fleet

Fleet electrification is an emerging focus area with opportunities to grow. In 2014, more than 70 investor-owned utilities announced a commitment to electrify 5% of their fleets as part of an [Edison Electric Institute initiative](#).

Fast Charging

Public fast charging infrastructure should also be prioritized. Drivers are more likely to buy an EV if they can see available public charging stations in the places where they would need to fuel. Though the CEC has offered grants to create fast charger highway corridors, there remains more growth opportunities in this space, particularly for community charging around major cities.

As the POUs consider investments in fast charging infrastructure, it is important to also consider the need to create “fast charger friendly” rate structures that mitigate the impact of demand charges on operating these public charging stations.

II. Competition, Customer Choice, and Innovation

SB 350 states in SEC 32:

(F) Widespread transportation electrification should stimulate innovation and competition, enable consumer options in charging equipment and services, attract private capital investments, and create high-quality jobs for Californians, where technologically feasible.

ChargePoint strongly supports this language. We encourage the POU's to develop programs that meet this requirement and allow for multiple vendors to participate and be selected by site hosts in a competitive market. The CEC should include competition, customer choice, and innovation as guidelines to govern submission of IRP data and reports.

III. Program Design

Utilities around the country have pursued various program designs for incentivizing the deployment of EV charging stations. We have found that the programs which move most quickly to lead to actual charging station installations are those that are simple with streamlined customer evaluation and approval. ChargePoint recommends rebate programs, where customers (site hosts) are able to purchase equipment and services directly from charging station vendors and receive a rebate from the utility for a portion of the cost. Los Angeles Department of Water and Power (LADWP) is a good example of a rebate program that could be replicated by other public utilities. LADWP received approval from its Board and City Council shortly after San Diego Gas and Electric and Southern California Edison received approval from the California Public Utilities Commission to start their own pilots. However, perhaps due in part to the complexity of both IOU pilots compared to LADWP's simple and nimble program design, LADWP has been able to move forward much more quickly in supporting actual station installations.

IV. Disadvantaged Communities

Utilities should seek to direct socialized funding to areas of greatest need including disadvantaged communities, pursuant to SB 350 which states:

Public Utilities Code Section 740.12. (a) (1) (C) Widespread transportation electrification requires increased access for disadvantaged communities, low- and moderate-income communities, and other consumers of zero-emission and near-zero-emission vehicles, and increased use of those vehicles in those communities and by other consumers to enhance air quality, lower greenhouse gases emissions, and promote overall benefits to those communities and other consumers.

V. Data and Monitoring

ChargePoint encourages utilities to reduce costs to customers and rely to the extent possible on embedded submeters for data and customer billing. Separate metering, external to the charging stations, can add costs to the program, reducing the overall cost effectiveness and potential station deployments under a limited budget. Embedded submetering in charging stations has now been proven to meet utility metering standards

established by ANSI and should be considered as a relevant and effective alternative to separate metering.

VI. Low Carbon Fuel Standard Credits

Under current law, utilities have sole right to credits generated from residential charging, including multifamily, and secondary rights, behind the charging station network operator or charging station owner for public and private commercial charging stations. Many utilities during the October 5 workshop expressed an interest in collecting LCFS credits on public commercial charging stations in order to generate revenue to pay for charging station rebates. While we generally support the investment of LCFS revenue into charging station rebate programs, ChargePoint cautions against adoption of EV infrastructure program conditions that would undermine the intent of the ARB regulations with respect to commercial and fleet operators' right to receive LCFS credits and use the resulting revenues. The revenue from these LCFS credits can allow a site host to pay for maintenance and services for that station or invest in more charging stations. It is also an important source of funding for EV charging station network operators, including ChargePoint, which has invested LCFS credit revenue into driver services include our mobile app and educational website materials. The use of LCFS credits to fund POU EV pilots should be thoughtfully calculated and limited to a certain period of time in order to allow site hosts or charging station operators the ability to generate LCFS credit revenue

Thank you for considering our comments. We look forward to working with the Commission and all of the POUs as they develop exciting new EV charging pilots.

Sincerely,

A handwritten signature in cursive script that reads "Anne Smart".

Anne Smart
Director, Government Relations and Regulatory Affairs
ChargePoint