

DOCKETED

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Additional submitted attachment is included below.



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July 3, 2018

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814 -5512

RE: Docket No. 17-EVI-01

To whom it may concern:

EVgo is grateful for the leadership of the California Energy Commission (CEC) as it relates to transportation electrification. EVgo is leading the way for vehicle electrification across the state and the country, and more than 90% of Californians now live within 35 miles of an EVgo fast charging station. The work EVgo has done in partnership with CEC, the California Public Utilities Commission (CPUC) and other industry partners have led to the electric vehicle (EV) charging infrastructure enabling California's leadership on EV adoption today. However, even more work and investment - building on what we have already done together - is needed to enable ubiquitous adoption of EVs in California. Access to robust public charging infrastructure will make the purchase of zero emission vehicles (ZEVs) an easier choice for Californians, which is why the California Electric Vehicle Infrastructure Project (CALeVIP) is such a critical program.

EVgo operates America's largest public EV fast charging network, with over 1050 chargers in 66 metropolitan markets. Primarily using DC fast chargers (DCFCs), EVgo fast charges more drivers for more miles than any public charging network in the nation. We provide over 100,000 monthly charges to 50,000+ EV drivers, powering EVs to drive over 5,000,000 miles monthly. Currently, we have more than 500 fast chargers deployed in California with many more sites under construction and dozens more coming this year. EVgo welcomes the opportunity to work closely with the state to expand that infrastructure to enable mass adoption of EVs.

As the Commission finalizes program guidelines for the DCFC incentive program, **we respectfully request that the Commission strike the proposed requirement that DCFC be available to the public 24 hours a day, 7 days a week, 365 days a year.** Given our experience installing charging stations in California at shopping centers, parking garages, city-owned locations, and the other site locations that CALeVIP deems eligible, we know that there would be unintended consequences with this requirement. Many optimal site locations - especially in prime retail locations which are ideal for DCFC given that EV drivers can charge their cars while running daily errands - restrict access to parking after midnight and before the site opens for retail business. As such, this requirement will have the unintended consequence of discouraging development at these prime locations, especially retail. While we share the intent and strive to have 24/7 availability of our DCFC locations, we would encourage the Commission to consider that to be a goal rather than a requirement.

Public-private partnerships like CALeVIP are critical to meeting the goals laid out by the Governor in his Executive Order, calling for five million ZEVs in California by 2030 and 250,000 electric vehicle chargers, including 10,000 direct current fast chargers, by 2025. EVgo thanks the Commission for the opportunity to provide input on this docket, and please do not hesitate to contact us if we can answer any additional questions or be of further assistance.

Sincerely,

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