

DOCKETED

Docket Number:	18-MISC-04
Project Title:	Vehicle Grid Integration Roadmap Update
TN #:	224764
Document Title:	ChargePoint Comments on VGI Roadmap Issues Matrix
Description:	N/A
Filer:	System
Organization:	ChargePoint/Anthony Harrison
Submitter Role:	Public
Submission Date:	9/21/2018 10:33:39 AM
Docketed Date:	9/21/2018

Comment Received From: Anthony Harrison
Submitted On: 9/21/2018
Docket Number: 18-MISC-04

ChargePoint Comments on VGI Roadmap Issues Matrix

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

September 21, 2018

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: COMMENTS OF CHARGEPOINT, INC ON VEHICLE-GRID INTEGRATION ROADMAP ISSUES AND GOALS

I. INTRODUCTION

ChargePoint appreciates this opportunity to provide comments in response to the California Energy Commission's (CEC) *Vehicle-Grid Integration Roadmap* Issues and Goals Matrix that was presented in a stakeholder webinar held on September 6, 2018.

ChargePoint is the largest commercial electric vehicle charging network in the world, with charging solutions for every charging need and all the places EV drivers go: at home, work, around town and on the road. With more than 54,000 independently owned charging spots and thousands of customers (including workplaces, cities, retailers, apartments, hospitals and fleets), ChargePoint is the only charging technology company on the market that designs, develops and manufactures hardware and software solutions across every market sector. ChargePoint drivers have completed more than 40 million charging sessions, saving upwards of 41 million gallons of gasoline and driving more than 975 million gas-free miles.

II. DISCUSSION

ChargePoint largely supports the goals and issues that have been identified by the CEC in the VGI Roadmap Matrix. In addition to the broad issues that framed in the Matrix,

ChargePoint would encourage the CEC to ensure the following topics are included as part of the update to the VGI Roadmap:

1. Implementation of ISO 15118

The VGI Roadmap update process should include a focus on addressing any barriers to the full implementation of ISO 15118. This should include coordination with the CPUC’s VGI Working Group process that has already identified the benefits of adopting this protocol as it relates to the deployment of charging infrastructure through investor-owned utilities SB 350 programs. Additionally, the CEC has already moved towards adopting ISO 15118 as a requirement for participating hardware vendors in the CALeVIP incentive program. The VGI Roadmap should reflect these recommendations and support the widespread adoption of this protocol in order to ensure that EV charging infrastructure deployed in California will be able to support renewable integration and grid needs.

2. The use of embedded metrology in EV Charging Stations

ChargePoint recommends that the deployment and use of “smart” charging stations with embedded metering capabilities be included in the scope of the VGI Roadmap. Communicating or “smart” chargers include embedded meters, which can be used to measure and collect charger utilization data and even support specific EV rates without added cost to the station. These smart chargers also eliminate the need to install an additional utility sub-meter which can help reduce costs for participating managing charging programs or utility EV charging rates. The benefits of these connected stations support expanded capabilities of utilizing these networked charging stations to

dynamically manage the EV charging load in a way that best benefits grid needs, such as EV-specific demand response programs. It is critically important to ensure EV charging stations deployed include the right functionality so that EVs can continue to generate grid benefits as the EV market grows.

3. Specific Use Cases for Fleet Electrification

ChargePoint also supports the inclusion and consideration of varying VGI use cases that are specific to fleet charging. Unlocking the full value of fleet electrification will include the critically important step of understanding the differences between residential and workplace charging patterns from primarily light-duty vehicles to large electrified fleets. This should include a focus on the different types of price signals that will be needed to support managing fleet charging load to the times of the day where it will be most beneficial to the grid, while still providing flexibility for fleet operators to manage fueling according to business needs. These price signals should include an exploration of utility rate design, demand management programs, and CAISO participation mechanisms that are specific to aggregated EV fleets. These steps will be necessary in order to ensure California's goals for electrifying all forms of transportation align with the State's grid needs.

III. CONCLUSION

ChargePoint applauds the work of the Energy Commission and staff in identifying the scope of issues for the VGI Roadmap update. This process remains vital to supporting the goal of deploying 250,000 charging stations by 2025, and reaching 5 million ZEVs on the road by

2030. ChargePoint looks forward to working with CEC staff and stakeholders as this process moves forward.

Regards,

A handwritten signature in black ink, appearing to read 'AH', with a long horizontal flourish extending to the right.

Anthony Harrison
Director of Public Policy
ChargePoint, Inc
Anthony.harrison@chargepoint.com
(408) 656-4292