

DOCKETED

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ChargePoint Comments AB 2127 EV Charging Infrastructure Assessment Implementation

Additional submitted attachment is included below.



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June 12, 2019

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 19-IEPR-04
1516 Ninth Street
Sacramento, California 95814-5512

Submitted via electronic commenting system for docket 19-IEPR-04

Re: IEPR Commissioner Workshop on the Electric Vehicle Charging Infrastructure Assessment (AB 2127)

ChargePoint appreciates the opportunity to provide comments on the California Energy Commission (CEC) IEPR Commissioner Workshop on the Electric Vehicle Charging Infrastructure Assessment (AB 2127).

ChargePoint is the world's largest and most open electric vehicle (EV) charging network with more than 66,000 Level 2 EV and direct current fast charging spots, including 29,000 public and semi-public in California. ChargePoint's customers include major employers, municipalities, universities, utilities, real estate developers and parking garage facility owners and operators that provide EV charging and related services to EV drivers.

California has an ambitious goal to deploy 1.5 million zero-emission vehicles and 250,000 EV charging stations, including 10,000 direct current fast chargers, by 2025. California also has a goal to deploy 5 million zero-emission vehicles by 2030, which will require even further scale-up of charging infrastructure. Given the state's long-term goals for greenhouse gas emission reductions and EV and EV infrastructure deployment, the state should support and foster efforts to ramp up deployment and this process will help provide the data to support those efforts.

AB 2127 (Ting, Chapter 365, Statutes of 2018), directed the CEC to collaborate with the California Air Resources Board and California Public Utilities Commission to "prepare a statewide assessment of the electric vehicle charging infrastructure needed to support the levels of electric vehicle adoption required for the state to meet its goals of putting at least five million zero emission vehicles on California roads by 2030, and of reducing emissions of greenhouse gases to 40 percent below 1990 levels by 2030." To inform this assessment, AB 2127 also tasked the CEC with regularly seeking data and input from stakeholders.

ChargePoint is supportive of the goals of AB 2127 and appreciates CEC staff's work to implement it and solicit stakeholder input in the process. We support the CEC's goal to provide an "independent, objective technology assessment," which is needed in the near term to address questions around the availability and sufficiency of current infrastructure and future needs. Going forward, ChargePoint supports the phased process as outlined by CEC staff in order to collect all the necessary data and incorporate it into future projections.

In regard to vehicle grid integration (VGI), we encourage the CEC to review DigiCert's whitepaper, "Practical Considerations for Implementation and Scaling ISO 15118 into a Secure EV Charging



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Ecosystem,”¹ which evaluates the gaps in the currently proposed implementation of ISO 15118 and outlines significant flaws that must be addressed to ensure the long term viability of VGI and ensure that fundamental protections, benefits, and control for drivers and businesses remain. ChargePoint embraces the spirit of making the switch to electric easy for businesses and drivers and believes it is critical that cross-industry collaboration ramp up significantly to address these critical gaps in any implementation of the standard. To this end, ChargePoint urges the CEC to work with stakeholders to facilitate cross-industry collaboration to address the gaps in 15118.

Thank you for your consideration of our comments. Please do not hesitate to contact me at alexandra.leumer@chargepoint.com if you have any questions or if we can provide additional information to help inform the assessment.

Sincerely,

A handwritten signature in black ink that reads "Alexandra Leumer".

Alexandra Leumer
Director, Public Policy
ChargePoint

¹ <https://www.chargepoint.com/15118whitepaper>

See also: <https://www.chargepoint.com/about/news/chargepoint-statement-iso-15118-white-paper/>