

DOCKETED

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EVCA Comment Letter on Counting Chargers

Additional submitted attachment is included below.



Electric Vehicle Charging Association

INNOVATION FOR CLEAN MOBILITY

June 26, 2020

Ms. Patricia Monahan
Commissioner, California Energy Commission
1516 Ninth Street, MS-33
Sacramento, CA 95814

Re: EVCA Comments on Integrated Energy Policy Report's 'Counting Chargers' Workshop

On behalf of the Electric Vehicle Charging Association (EVCA), thank you for the opportunity to submit comments on the Energy Commission's (Commission) 'Counting Chargers' workshop as part of the transportation update to the Integrated Energy Policy Report.

EVCA is a non-profit trade association representing eleven electric vehicle service providers (EVSPs), software and equipment manufacturers, installation and maintenance providers, and an autonomous and electric ridesharing fleet operator. Our members include ABM Industries Inc., Blink Charging, BTCPower, ChargePoint, Clean Fuel Connection, Cruise, EVBox, EV Connect, EVgo, FLO, Noodoe, and Volta. EVCA's mission is to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the adoption of electric vehicles (EVs) and deployment of charging infrastructure.

EVCA commends the Commission for its continued efforts to accelerate the deployment of EV charging stations. Achieving scale-up of infrastructure will remain key to achieving the state's EV deployment and greenhouse gas (GHG) emission reduction goals. However, it's important to ensure continued deployment and scale-up further enables and supports competition, rather than skewing business strategies in the marketplace. EVCA believes that ensuring competition will ultimately enable cost-efficient technologies and deployment strategies that furthers the state's transportation electrification efforts. Therefore, we provide the below comments for your consideration:

1. EVCA views the Commission’s definitions of “public” and “shared private” charging stations as appropriate for this effort.

The public sphere needs the greatest amount of state support to incentivize charging station deployment; state funding programs also prioritize funding light-duty infrastructure deployment for infrastructure in publicly available locations. To maintain consistency with this focus, EVCA believes the Commission’s effort to tally the number of chargers in the state should prioritize counting the ones that are publicly available.

For the purpose of determining information sharing requirements, the proposed definitions for “public” and “shared private” are consistent with the industry’s understanding of public and private charging stations, and they are also consistent with the Air Resources Board’s definitions of “publicly available” charging stations via the Electric Vehicle Charging Station Open Access Act¹.

2. Submitting information regarding “shared private” chargers should be voluntary.

Information regarding the location of “shared private” charging stations serves as important “business intelligence” that informs competitive deployment strategies. Sharing this information with the public, even when aggregated, can skew market activities by informing companies where to deploy charging stations to be the most profitable and competitive. Protecting innovation and competition in the marketplace is key to ensuring companies can provide cost-competitive solutions that further the state’s EV and EV infrastructure deployment goals. Therefore, we respectfully request the Commission ensure that EVSPs can provide this information on a voluntary basis.

3. EVCA supports the principles stated on Slide 7 of the “Proposition to Amend Title 20” Presentation.

Slide 7 of the presentation titled, “Proposition to Amend Title 2020 EVSE Data Collection” states that the Commission wants to:

- “Automate [reporting] as much as possible
- Leverage existing technology
- Minimize burden of compiling and reporting data, and;
- Balance frequency of data reporting.”

¹ <https://ww2.arb.ca.gov/our-work/programs/electric-vehicle-supply-equipment-evse-standards>

EVCA strongly supports these principles for collecting EVSE data. The COVID-19 induced economic recession has severely impacted the EV charging industry. Companies have experienced significant lay-offs, reductions in revenue, and a slowdown in day-to-day operations. Sales of most EV models are down, and new vehicle launches have been delayed. Gasoline prices are at their lowest levels in 15 years. In addition to concerns about confidential business information, we are particularly sensitive to cost impacts from this regulation exacerbating our already stretched resources during these uncertain times, and the resources necessary to implement new IT solutions to collect some of the data that CEC requested.

EVCA has already begun discussions with Commission staff to better understand the goals of this regulation and how best to collaborate with the Commission going forward and will be submitting further comments on how to best fulfill the aforementioned principles. EVCA will continue to engage in this regulatory process to resolve some of its concerns while helping the Commission to fulfill its goals.

Thank you for your consideration,

A handwritten signature in blue ink, appearing to read 'A. Cherkaoui', with a large, stylized flourish at the end.

Abdellah Cherkaoui
Chair
Electric Vehicle Charging Association