

DOCKETED

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ChargePoint comments on CAlEVIP Docket 17-EVI-01

Additional submitted attachment is included below.



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Mr. Brian Fauble
Energy Commission Specialist II
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: EVCA Comments on CALeVIP Design Workshop

Dear Mr. Fauble,

ChargePoint appreciates the opportunity to comment on proposed programmatic changes to the California Energy Commission's (CEC) design of the California Electric Vehicle Infrastructure Voucher Incentive Project (CALeVIP). In light of Governor Newsom's recent executive order to require 100 percent of new passenger vehicle sales to be zero-emission by 2035, it is more crucial now than ever that the state rapidly scale the deployment of charging infrastructure. While CALeVIP's goals are to "provide drivers of plug-in electric vehicles with convenient access to chargers and strives to encourage more Californians to consider purchasing EVs"¹, additional changes to the program can help further these goals. Increasing charging deployment and promoting innovation through expanded access to well-designed charging infrastructure programs will further stimulate private investment in the industry.

ChargePoint is one of the world's largest electric vehicle (EV) charging networks, with scalable solutions for charging needs at home, work, around town, and on the road. ChargePoint's network offers more than 115,000 places to charge, including more than 40,000 spots in California, and those numbers continue to grow. With customers that include workplaces, cities, retailers, apartments, hospitals, and fleets, ChargePoint provides an integrated experience enabling consistent performance, efficiency and reliability at every touchpoint whether one is using a mobile app, plugging into a charger, managing the station or analyzing charging data. On the network, drivers have completed more than 80 million charging sessions, saved upwards of 96 million gallons of fuel, and driven more than 2.3 billion electric miles.

Since 2007, ChargePoint has been committed to making it easy for businesses and drivers to go electric, with the largest EV charging network and most complete set of charging solutions available today. ChargePoint's cloud subscription platform and software-defined charging hardware includes options for every charging scenario from home and multifamily to workplace, parking, hospitality, retail and fleets of all kinds. ChargePoint continues to create the new fueling network to move all people and goods on electricity now and in the future.

We offer the comments below to help support our shared goals of increasing infrastructure deployment while also supporting a competitive market.

1. Priority should be given to completing existing programs within a defined timeline.

We are very encouraged to see state commit additional funding for CALeVIP and hope this will help expand the program into new regions, but there are critical problems to address with the existing programs first. Rather than focusing on new programs, ChargePoint believes priority should be given to completing the programs that are currently open. It is critical to address the existing backlog and identify

¹ See: <https://calevip.org/about-calevip>



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what resources are needed by the program administrator to make sure these needed resources are provided in order to complete these programs. The existing problems will just be exacerbated if needed resources are not committed now.

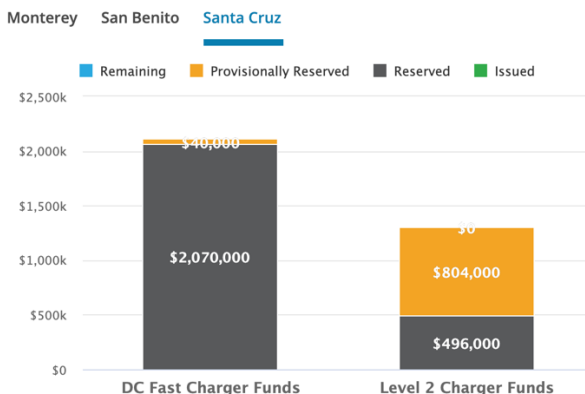
A primary issue is the delay in pay out of funds. For a number of the programs underway, there are still millions of dollars that have yet to be issued to entities that have been awarded and completed projects. When additional parties, like the Sacramento Municipal Utilities District (SMUD), are part of the funding process, the timing can be further delayed. For example, in Sacramento, ChargePoint is still awaiting funds from January because the project has yet to be closed out. To provide a contrast, typical IOU programs award rebate funds in 4-6 weeks. It would be ideal if CALeVIP grant dollars also moved within a 6-week timeframe. Additional government agencies partnering with the CEC to provide funding for CALeVIP should be subject to this same timeline. By not awarding funds in a timely fashion, there is risk of chilling the market because program participants wait for funding but cannot rely on a timely payout.

Finally, we also urge greater transparency in providing data on where grant funding is being directed. To this end, we urge the applicant name and number as well as the number of L2s and DCFC ports applied for to be made publicly available, following best practices for other CEC solicitations.

2. L2 stations should be given priority in the approval process.

ChargePoint believes that both L2 and DCFC are important to enabling EV adoption. Unfortunately, we have found that CALeVIP funding for these different solutions are not being issued in a consistent manner, with priority often being given to DCFC sites. In the South Coast, there is a clear discrepancy between awarding the funds for DCFC sites and L2 sites (see image below). We urge that priority be given to L2 station as these stations can be installed within a matter of weeks, as there are fewer steps for installation, and can be up in running to provide charging to the community sooner.

Central Coast Incentive Project



9% of funds have been reserved or issued to Disadvantaged Communities.
 \$7,090,000 of applications received in excess of DC fast charger funds.



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3. Proprietary and closed network chargers should not be eligible for CALeVIP funding.

As noted above, the purpose of the CALeVIP program is to deploy convenient public charging to encourage more drivers to purchase or lease EVs. Visible open, non-proprietary chargers encourage drivers to purchase or lease whichever EV works best for them. Because they can only charge one make of vehicle, closed network or proprietary chargers only encourage drivers to purchase or lease the make of vehicle that the proprietary charger can charge.

Owners of vehicles that use proprietary or closed network chargers can purchase adapters, which are affordable and widely available, that enable them to use open, non-proprietary chargers. Currently, no adapter exists that allows non-Tesla vehicles to charge with Tesla connectors. On the other hand, Tesla vehicles can and do utilize J-1772 connectors and CHAdeMO connectors with adapters.

Makers of vehicles that use a closed network and proprietary charging technology have sufficient economic incentives to deploy chargers on their own, without the need for public support, because such chargers directly encourage drivers to purchase vehicles from their company rather than from other automakers. The CEC should not use public funds to encourage EV purchases from a single company.

4. Require Electric Vehicle Infrastructure Training Program (EVITP) certification no earlier than January 1, 2022.

Assembly Bill 841 (Ting) mandates EVITP certification as a condition of accessing EV charging incentives beginning January 1, 2022. ChargePoint, along with the Electric Vehicle Charging Association, worked extensively with Assemblymember Ting and the bill's sponsor to push out the implementation date for EVITP for three key reasons.

First, the charging industry needs time to prepare for EVITP certification and integrate it into their operations. Companies need to adjust their timelines and planning cycles while they work with their contractors to get them certified. There is no clear benefit to requiring EVITP certification by September 2021, when the charging industry and labor groups came to an agreement to require this starting January 2022.

Second, there are critical gaps in EVITP's curriculum that need to be addressed, particularly concerning DCFCs. Once again, we worked with Assemblymember Ting and AB 841's sponsor to specify that the CEC should conduct workshops to ensure gaps in curriculum for DCFCs be addressed and integrated. This process will take time and the CEC should work with EVITP to ensure the training requirement comprehensively covers all charging technology.

Third, it remains to be seen that EVITP training infrastructure is widespread, accessible, and that the online course is operating smoothly. As noted in previous comments², we are concerned by the lack of accessibility of EVITP's training infrastructure; most locations are concentrated in the Bay Area and LA County and there are no locations north of Sacramento and very few in the Central Valley. **Therefore, we also recommend that as long as the CEC requires EVITP, it should also require EVITP to offer online courses to maintain accessibility to contractors across the state, especially in rural areas.**

² See: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=234156&DocumentContentId=66992>



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Further, it would be beneficial to offer these trainings in Spanish as many of the contractors who work in this field in California are Spanish speaking.

Requiring EVITP certification in January 2022 will give EVITP more time to expand its training infrastructure and improve the operation of its online operations. These considerations are extremely important to the industry to ensure proper access to training and protect against unduly slowing charging deployment.

5. Do not require contractors to be listed on EVITP's website in order to be eligible for the program if they are able to provide a certificate of completion.

There is no guarantee that EVITP will update their website with certified contractors on a consistent and regular basis and therefore this should not be a requirement for contractors. It is sufficient that contractors provide a copy of their certification. Otherwise, certified contractors may be unnecessarily excluded from participation.

Please feel free to contact me at alexandra.leumer@chargepoint.com if you have any questions.

Sincerely,

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

Alexandra Leumer
Director of Public Policy
ChargePoint