DOCKETED	
Docket Number:	20-TRAN-04
Project Title:	Electric Vehicle Infrastructure Project Funding
TN #:	236220
Document Title:	FLO Comments on EV Infrastructure Allocation Workshop
Description:	N/A
Filer:	System
Organization:	FLO/Cory Bullis
Submitter Role:	Public
Submission Date:	1/4/2021 3:31:01 PM
Docketed Date:	1/4/2021

Comment Received From: Cory Bullis
Submitted On: 1/4/2021
Docket Number: 20-TRAN-04

FLO Comments on EV Infrastructure Allocation Workshop

Additional submitted attachment is included below.

January 4, 2021

Mr. Matt Alexander
Ms. Sharon Purewal
Ms. Jennifer Allen
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re : FLO Comments on the CEC's « Light-Duty Infrastructure Allocation » Workshop

Dear Mr. Alexander, Ms. Purewal, and Ms. Allen,

Thank for the opportunity to comment on the Energy Commission's (CEC) proposed funding concepts for multi-unit dwellings (MUDs), advanced technologies, and advanced charging projects[1].

FLO is a leading North American charging network for electric vehicles and a major provider of smart charging software and equipment. FLO offers public, commercial, and residential chargers, including Level 2 EV supply equipment (EVSE) and DC fast chargers (DCFC). In North America, FLO has deployed over 35,000 charging stations and manages approximately 500,000 unique charging experiences that transfers 5.5 GWH of energy monthly. FLO's headquarters and network operations are based in Quebec City.

1. **FLO supports proposal 2c: alternative to "Home Charging", including both high-powered Level 2 charging and downtown core curbside charging.**

FLO appreciates the CEC's consideration of projects that serve as an alternative to home charging, and respectfully urges the CEC to prioritize this area of focus for several reasons:

Deploying charging stations at MUDs remains difficult. Split incentives, high upfront infrastructure costs, and lack of awareness, among other reasons, block Electric Vehicle Service Providers (EVSPs) from deploying stations at many viable locations. Meeting the state's EV and charging infrastructure deployment goals, especially with the recent 2035 executive order, is an urgent task. Deployment at MUDs, while critical, will likely take years to achieve on a larger scale, especially for older buildings. Therefore, the CEC should prioritize investing in alternatives that deploy chargers faster and help the overall market scale more rapidly to meet the state's goals.

Focusing on downtown cores also provides an important equity benefit. Many lower-income households, particularly renters, live in MUDs[2]. Given the difficulty and lack of speed in deploying stations at MUDs[3], curbside charging in downtown cores can help close this gap because it can be deployed more rapidly and at a larger scale. This is due in part to its ability to

[1] CEC. "Light-Duty Electric Vehicle Infrastructure Allocation Workshop". December 17, 2020. Pages 62, 70 and 75.
[2] Energy Innovation. "Increasing Electric Vehicle Charging Access at Multi-Unit Dwellings: Workshop Summary Report. September 2020. Page 2.
[3] Ecology Action. "Innovation in Electric Vehicle Charging for Multi-Unit Dwellings". November 4, 2020. Page 3.

provide flexible and low-cost charging day and night, as well as its lower electrical load making it a good fit for many locations.

The CEC should prioritize broader projects to address overarching challenges in the market, which proposal 2c would do. The market is still at a nascent stage, with industry still trying to increase its economies of scale to decrease overall costs. Even with state, utility, or local incentives, EVSPs face challenges making the case to site hosts to purchase EV charging stations. Cost primarily drives this challenge. FLO does not dismiss the value of specific charging technologies or use cases. Rather, given limited funding, we believe the CEC must prioritize the larger challenges of the market, which remain economies of scale and cost competitiveness. Specific use cases and specialized charging technologies, while important, are not likely to serve the larger needs of the market, and as a result, may not support the additional co-benefits of leveraging further private investment at the scale needed to meet state goals.

Downtown cores provide immense opportunity to serve many EV drivers. However, many downtown cores lack larger and more accessible parking lots that are ideal to deploy stations at. Given this, curbside charging is a viable alternative to serve these areas' growing need. FLO has deployed nearly 200 curbside chargers on behalf of the City of Los Angeles Bureau of Street Lighting, which are consistently increasing in their utilization. Curbside charging serves a broader market need because its useful both as an alternative to residential charging and provides an amenity to shoppers at many commercial locations. They can be deployed in most if not all downtown locations, allowing many cities and EVSP business models to benefit, as opposed to only a targeted set of stakeholders.

As the CEC considers focusing on curbside charging, it should include both conventional and high-powered chargers for *both Level 2 stations and DCFCs.* Inclusivity enables broader participation from stakeholders, promotes innovation and competition, and creates more opportunity for deployment. Some locations may be more viable for a high-powered charger, and vice versa, for any number of reasons, such as feasible electrical capacity or intended parking dwell time. We respectfully recommend the CEC be sensitive to the varying needs and capacities of downtown cores and users, and therefore be more inclusive toward charging technologies.

2. **FLO does not support investing in Level 1 charging at MUDs.**

We recognize that Level 1 charging can provide a low-cost opportunity when there are significant capital cost barriers to deploying stations at MUDs. However, EV drivers' charging preferences are quickly evolving, especially as the state moves beyond the "early adopters" phase of EV deployment. Many drivers already expect a fast, convenient, and accessible charging experience. As drivers increasingly rely on EVs, Level 1 charging will become quickly outdated, as EV drivers will perceive a slower charging experience as too inconvenient. This use case is best suited for drivers with smaller charging needs, including because they do not drive much. The opportunity for fossil fuel displacement is very limited.

Furthermore, Level 1 charging provides minimal additional co-benefits to drivers and the grid, considering that they are generally not networked, they typically don't directly allow for power sharing, nor would they generally have the capability to directly provide grid services. The CEC is likely to miss higher priority opportunities for advancing technological developments and offering important benefits to drivers if it re-directs some of its limited funds to Level 1 charging.

Thank you for your consideration,

[Electronically Submitted]

Cory Bullis
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