DOCKETED	
Docket Number:	20-TRAN-04
Project Title:	Electric Vehicle Infrastructure Project Funding
TN #:	238842
Document Title:	ChargePoint Comments - EV Infrastructure Project Funding for Multifamily & Rural
Description:	N/A
Filer:	System
Organization:	ChargePoint
Submitter Role:	Public
Submission Date:	7/13/2021 4:49:20 PM
Docketed Date:	7/13/2021

Comment Received From: ChargePoint Submitted On: 7/13/2021 Docket Number: 20-TRAN-04

Docket 20-TRAN-04, EV Infrastructure Project Funding for Multifamily & Rural

Additional submitted attachment is included below.

chargepoint.com



ChargePoint, Inc. 240 East Hacienda Avenue | Campbell, CA 95008 USA +1.408.841.4500 or US toll-free +1.877.370.3802

July 13, 2021

California Energy Commission Docket Unit, MS-4 Re: Docket No. 20-TRAN-04 1516 Ninth Street Sacramento, CA 95814-5512

Re: Docket number 20-TRAN-04, Electric Vehicle Infrastructure Project Funding

ChargePoint appreciates the opportunity to provide comments on the California Energy Commission (CEC) Light-Duty Electric Vehicle Infrastructure Projects for Rural and Multi-Unit Dwelling Residents Funding Workshop.

Since 2007, ChargePoint has been committed to making it easy for businesses and drivers to go electric, with the largest electric vehicle (EV) charging network and most complete set of charging solutions. ChargePoint has enjoyed numerous partnerships with the CEC. Together we have helped accelerate EV charging deployment in rural communities, along highway corridors, and at multifamily properties. In addition, we have increased California-based EV charging manufacturing and supply chains and stimulated clean energy jobs throughout the state. ChargePoint continues to create the new fueling network to move all people and goods on electricity and looks forward to continued partnership with the CEC.

The CEC's Electric Vehicle Infrastructure Project Funding will play a critical role in supporting Governor Newsom's Executive Order, calling for 100% of new vehicle sales to be zero-emission within 15 years. We commend CEC staff for the efforts to engage stakeholders in developing the plan and hope the comments below help inform this process.

EV Charging for Multifamily Residents

Funding & Eligibility

1. Is a maximum project award of \$3 million and a number of 100 units served in the right ballpark?

Yes, the maximum project award of \$3 million and a number of 100 units served is appropriate and will make significant progress electrifying multifamily housing developments.



a. Do potential applicants feel they could develop and manage projects of this size?

Yes, there are multiple organizations with the experience and expertise required to manage projects of this size.

b. Is the funding level appropriate?

Yes, the funding level is appropriate for a multifamily project.

2. Is allowing the various types of installations and equipment the right approach?

Yes, this is the right approach. The charging solution should be tailored for each specific community.

3. Should there be a required type of project team member (public entity, CBO)?

No, prime applicants should be able to select team members that best support their project and deliver the most value to the drivers they serve.

Match Funding

1. What would be a fair and reasonable match share requirement?

Match share should be 10% for disadvantaged and low- income communities and 20% for all other communities.

- 2. Should the match share requirement differ based on:
 - a. Type of applicant?

No

b. The type of application or business model?

No

c. The locations of project sites in disadvantaged/low-income communities.

Yes

Project Readiness

1. What is a reasonable requirement for projects of this size?

Letter of intent from site host.

2. Does a longer application submittal timeline allow applicants to secure site locations through signed agreements with site owners?

No. It is not reasonable to require participants to engage in legal negotiations prior to receiving a notice of proposed award. This requirement would lead to significant wasted investment amongst applicants that are not awarded CEC funding.

Technical and Operations Requirements

1. Does the equipment need to be network capable and be networked (i.e., have a network agreement)?

Yes, equipment must be networked to enable utilization data reporting to the Energy Commission, Low Carbon Fuel Standard (LCFS) reporting, and promote an optimal driver experience. Networked charging solutions let EV drivers see real-time info, such as station availability, price, and power level. Drivers may also see pictures of the chargers, write comments, and even reserve a charger. This makes it easy for drivers to find stations and take advantage of services at a site host's business.

Networked chargers allow station owners to manage access to charging by groups of drivers (e.g., employees, customers, etc.) and set pricing policies according to their groups. Networked chargers allow site hosts to set dynamic pricing and access policies at different times of day and make adjustments whenever needed. Networked chargers help EV drivers get along with each other by setting fees that discourage people from staying parked at a station long after they are done charging, which would prevent others from getting a charge. Networked chargers use built-in reporting and analytics on EV charging usage, energy costs, and environmental savings to manage, plan and invest in your EV charging program more effectively. Networked chargers constantly update with new features, so your investment keeps getting better, and retains its value over the long term.

Non-networked charging, especially in multifamily properties, will not promote driver confidence. Drivers are often forced to guess if a charger is available and, in some cases, whether the charger is operational. Non-networked chargers fall short in the conquest to reduce range anxiety. Non-networked chargers do not provide any of the benefits of networked chargers. As a result, drivers using nonnetworked chargers experience longer dwell times, lower utilization, and poor driver experiences, slowing down EV adoption in this critical market.

2. Are we missing any important technical requirements?

All DC fast chargers should include SAE CCS connectors and CHAdeMO connectors on each pedestal. ChargePoint's portfolio of owned and operated DC fast chargers supported 14,694 sessions in California from April 1, 2021, to June 30, 2021. Nearly 25% of those charging sessions were enabled by a CHAdeMO

connector. ChargePoint's chargers are located all over the state, providing for a nice sample size. It is premature to discontinue requiring both connectors on each DC fast charger in this new Energy Commission program.

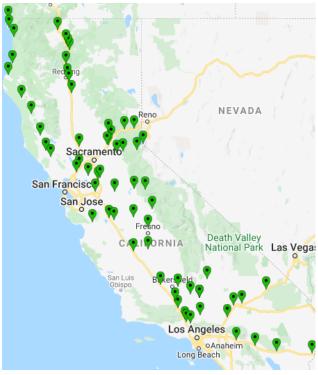


Figure 1: ChargePoint's owned and operated DC fast charging corridor s

Furthermore, Tesla connectors should not be eligible for Energy Commission funds. Tesla is a proprietary connector reserved for one automotive manufacturer. Tesla drivers may purchase an adapter to use standardized connectors, while non-Tesla drivers have no way to receive a charge from a Tesla connector. Allowing Tesla connectors would be an inappropriate use of Energy Commission funding.

ChargePoint supports the ability to include off-site curbside charging or charging on public/private property options using a mileage-based threshold maximum of ½ mile from the multi-family property site. A mileage-based threshold is important as it is verifiable through the use of mapping technology where other methods such as drive time can vary significantly. ChargePoint further encourages a sliding scale in the application scoring to award more points to projects sited even closer to the multi-family community.



3. What is the appropriate level of customer service?

Drivers must have access to 24/7 customer service through a toll-free phone number.

4. Do sites and the chargers need to be available 24/7?

No, sites and chargers do not need to be available 24/7, but in scoring applications, additional points should be awarded for chargers that are available 24/7 as they allow for greater availability and flexibility for drivers.

Reliable Rural Charging Solutions

Goals and Proposed Funding

1. Should the CEC focus on any additional goals to serve rural drivers?

The CEC has outlined appropriate goals for the solicitation.

Are the minimum and maximum award amounts per applicant sufficient?
a. Is a minimum of \$500,000 per applicant to much?

The minimum is appropriate.

b. Is a maximum of \$1,600,000 per applicant to little?

The maximum is appropriate.

3. Should minimum and maximum award amounts be based on applicants or projects?

The minimum and maximum award amounts should be based on project. The highest scoring applicants should be eligible for multiple awards.

Applicant Eligibility and Match

1. Are the criteria for eligible applicants sufficient or too broad?

The required teaming arrangement is too specific. ChargePoint has deployed charging stations in rural communities throughout California in partnership with the CEC. In multiple instances, ChargePoint formed regional and local partnerships that could only be formed while doing the real work at a local level. By requiring certain partnerships to be established upfront, creativity and innovation may be stifled over the course of the project. ChargePoint encourages



the CEC to require applicants to explain how they will achieve certain goals rather than requiring specific formal partnerships.

- 2. What would be a fair and reasonable match share requirement?
 - a. Should the CEC require match for rural areas?

Yes, 10% for disadvantaged and low-income communities. 20% for all other communities.

b. Should match requirements differ for lead applicants?

No

c. Should match requirements be based on applicant or type of business and technology model?

No

Project Requirements (Project Sites and Data)

1. What kinds of sites best support rural daily travel and charging?

Fueling and convenience, restaurants, and municipal parking lots.

2. With the goal to expand the charging network and fill charging gaps, should the CEC consider a minimum number of sites per applicant?

Minimum award size is sufficient.

3. What are ways to minimize charger vandalism at sites?

Lighting, surveillance and locating chargers in highly visible locations.

Project Requirements (Equipment)

1. Should the CEC require minimum charging rates (in kW) for chargers deployed in and around rural areas?

No, the charging solution should be tailored for each specific site and use case.

a. What are reasonable minimum rates requirements for DC Fast and Level 2 chargers in and around rural areas?

DC fast chargers should be rated at 50 kW or above. Rural deployments for DC fast chargers often require a new utility service. It may be cost prohibitive for many applicants to install and operate higher powered chargers.

2. Does equipment need to be network capable and be networked (i.e., have a networking agreement)?

Yes, equipment must be networked to enable utilization data reporting to the Energy Commission, Low Carbon Fuel Standard (LCFS) reporting and to promote an optimal driver experience. Networked charging solutions let EV drivers see real-time info, such as station availability, price, and power level. Drivers may also see pictures of the chargers, write comments, and even reserve a charger. This makes it easy for drivers to find stations and take advantage of services at a site host's business.

Networked chargers allow station owners to manage access to charging by groups of drivers (e.g., employees, customers, etc.) and set pricing policies according to their groups. Networked chargers allow site hosts to set dynamic pricing and access policies at different times of day and make adjustments whenever needed. Networked chargers help EV drivers get along with each other by setting fees that discourage people from staying parked at a station long after they are done charging, which would prevent others from getting a charge. Networked chargers use built-in reporting and analytics on EV charging usage, energy costs, and environmental savings to manage, plan and invest in your EV charging program more effectively. Networked chargers constantly update with new features, so your investment keeps getting better and retains its value over the long term.

Non-networked charging, especially in multifamily properties, will not promote driver confidence. Drivers are often forced to guess if a charger is available and, in some cases, whether the charger is operational. Non-networked chargers do not support, fall short in the conquest to reduce range anxiety. Non-networked chargers do not provide any of the benefits of networked chargers. As a result, drivers using non-networked chargers experience longer dwell times, lower utilization, and poor driver experiences, which can slow down EV adoption in this critical market.

Project Requirements (Project Implementation and Operation)

1. What is a reasonable level of public access to a rural charging site?

We feel 24/7 access should be required for publicly accessible chargers in rural communities.

2. What are reasonable minimum requirements for maintenance plans in rural areas?

95% uptime on an annual basis is reasonable for rural areas.

3. What are reasonable minimum requirements for data collection if chargers are non-networked?

Equipment must be networked to enable utilization data reporting to the Energy Commission, Low Carbon Fuel Standard (LCFS) reporting, and to promote an

optimal driver experience. Networked charging solutions let EV drivers see realtime info, such as station availability, price, and power level. Drivers may also see pictures of the chargers, write comments, and even reserve a charger. This makes it easy for drivers to find stations and take advantage of services at a site host's business.

ChargePoint looks forward to continued collaboration with the CEC to accelerate the state's transportation electrification goals. Please do not hesitate to contact me at dedrick.roper@chargepoint.com if you have any questions or if we can provide additional information.

Sincerely,

Dedrick Roper Director, Public-Private Partnerships ChargePoint