

**DOCKETED**

<b>Docket Number:</b>	17-EVI-01
<b>Project Title:</b>	Block Grant for Electric Vehicle Charger Incentive Projects
<b>TN #:</b>	243170
<b>Document Title:</b>	ChargePoint Comments - CALeVIP 20
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	ChargePoint
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	5/19/2022 5:03:17 PM
<b>Docketed Date:</b>	5/20/2022

*Comment Received From: ChargePoint  
Submitted On: 5/19/2022  
Docket Number: 17-EVI-01*

**ChargePoint Comments 21-TRAN-03\_ CALeVIP 20**

*Additional submitted attachment is included below.*



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

May 19, 2022

California Energy Commission  
Re: CEC Docket No: 17-EVI-01  
1516 Ninth Street Sacramento, CA 95814

Submitted to on-line portal:  
<https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=17-EVI-01>

**Re: Docket Number 17-EVI-01, Block Grant for Electric Vehicle Charger Incentive Projects**

ChargePoint appreciates the opportunity to provide comments on the California Energy Commission (CEC) Block Grant for Electric Vehicle Charger Incentive Projects including Communities in Charge and CALeVIP 2.0.

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. In pursuit of our goal, ChargePoint has enjoyed numerous partnerships with the CEC, and together we have helped accelerate EV charging deployment in rural communities, along highway corridors, and within multi-family properties. We have increased our California-based EV charging manufacturing and supply chains, and have stimulated clean energy jobs throughout the state. ChargePoint continues to build the new fueling network to move all people and goods on electricity and looks forward to continued partnership with the CEC.

The CEC's Block Grants for Electric Vehicle Charger Incentive Projects will play a critical role in reducing the gaps of regional EV charging needs and can help to speed up the deployment and installation of EV charging stations in California towards meeting the Governor's goals. We commend the CEC staff for their efforts to engage stakeholders to identify targeted charging incentive projects and appreciate your consideration of these comments.

**I. Block Grant Equipment Requirements**

ChargePoint supports the CEC's current equipment requirement and appreciates the timelines provided by the CEC to meet these new requirements. ChargePoint suggest slight modifications to the timelines to align with timing needed to complete certification of any new requirements the CEC may approve.

ChargePoint supports interoperability and is committed to designing and deploying products that support our customer and industry needs. We appreciate the proposal to adopt OCPP 1.6 or higher but note that while OCPP 2.0.1 has been announced, OCA has not yet announced timing for that certification to begin. OCPP 2.0.1 includes additional functionalities that could improve the driver experience, enable better power management, and grid support including device management and smart charging, as well as critical



support for ISO 15118. We ask the CEC to extend the September 1, 2022 timeline for OCA certification to better align with the availability of certification for OCPP 2.0.1. This date may also be challenging due to the time it will take for testing and certification, especially with many submitting products for certification at the same time. We recommend the CEC provide sufficient time for testing and certification to be completed and recommend extending the date to 2023. Lastly, for consistency and technical reasons, we recommend aligning all new requirements for OCPP and ISO 15118 to the same July 1, 2023 timeline.

ChargePoint also recommends the CEC consider exempting residential charging installations, including both single family and multi-family dwellings, from the new technology requirements. Without exemptions, implementation into these areas and use cases which may be the hardest to reach and are intended to benefit the most, could be delayed by the additional requirements.

We commend the CEC for being the first to require the ENERGY STAR certification for Level 2 charging stations with the CALeVIP Fresno County Incentive Project, which led to more companies to pursue certification. ChargePoint strongly supports ENERGY STAR and is proud to have had the first ENERGY STAR certified Level 2 charging station. We were actively engaged in the development of ENERGY STAR version 1.1 for DC EVSE and will continue to contribute to the specification as it evolves. However, ENERGY STAR for DCFC will require different testing procedures when compared to Level 2 to get certification, therefore we ask the CEC to provide more time for this new certification to be completed. According to the ENERGY STAR website, there are currently no DCFC certified at this time. As manufacturers begin to attempt to complete the certification process, there is likely to be a delay.

## **II. Communities in Charge**

ChargePoint strongly supports CALSTART's initiative to focus investment to accelerate deployment of Level 2 charging stations and encourages CALSTART to prioritize multifamily housing similar to other CEC targeted programs like GFO-21-603 Reliable, Equitable, and Accessible Charging for Multi-Family Housing (REACH). ChargePoint considers multi-family homes to have some of the greatest need for funding, particularly those located in low-income and disadvantaged communities and encourages CALSTART to find efficient ways of providing charging opportunities for multifamily residents through enhanced incentives offered through Communities in Charge.

## **III. CALeVIP 2.0**

### **Question 1. New Eligibility Requirements:**

ChargePoint strongly recommends the CEC reconsider the selection methodology and implementation of the three tiers; Ready to Build, Design-Approved, and Ready to Go. We believe that the up-front cost associated with site design and engineering, permitting and utility design will mean that only the well-capitalized applicants and EV service providers will be able to participate in CALeVIP 2.0. This approach seems to be encouraging free ridership from entities with projects underway and that may be able to proceed without grant funding. This approach may also disadvantage small businesses that are not able to spend those resources until grant funding is secured and discouraging investments from those businesses in low-income and disadvantage communities. While we acknowledge the inefficiencies with CALeVIP today and support the need for improvements to address the 40% cancellation rate and long

processing times, we believe the CEC should take a more incremental approach. An incremental approach we recommend is to require design drawings and plans, which can demonstrate project feasibility and readiness, but not require a permit application or utility service design application. We feel that these suggestions combined with the application window and randomization of applications could create significant improvements.

Question 2. Application Window:

ChargePoint strongly support a 30-day application window and then randomization of all applications submitted that meet the new higher eligibility requirements.

Question 3. Region Concepts:

ChargePoint strongly supports CEC's goals to distribute funds equitably and widely. ChargePoint supports funding projects that consider population and EV adoption, and match population to EV charging need and demand. Focusing projects based by population and geographic regions will ensure a straightforward implementation, allow more flexibility for applicants within each region, and help to guide funding for DCFC deployments. ChargePoint recommends income be included as an additional consideration as key aspects of a given population or geographic region will vary, depending on income and environmental quality.

Question 4. Power Output:

ChargePoint supports a varied approach to DCFC power levels as different use cases exist based on the site type and dwell time. We recommend that the minimum power output be 50kW for all. For projects located within 1 mile of an Interstate or Highway, we support increasing the minimum power output to 150kW.

Thank you for your consideration of our comments. ChargePoint looks forward to continued collaboration with the CEC to accelerate the California's transportation electrification goals. Please do not hesitate to contact me at [john.schott@chargepoint.com](mailto:john.schott@chargepoint.com) if you have any questions or if we can provide additional information.

Sincerely,



John Schott  
Director, Grant Development  
ChargePoint