

**DOCKETED**

<b>Docket Number:</b>	22-EVI-03
<b>Project Title:</b>	National Electric Vehicle Infrastructure Deployment Plan Development, 2022-26 for CEC and Caltrans
<b>TN #:</b>	243675
<b>Document Title:</b>	Rivian Comments - on California's Deployment Plan
<b>Description:</b>	Confirmed document should be in Docket No. 22-EVI-03.
<b>Filer:</b>	System
<b>Organization:</b>	Rivian
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	6/22/2022 3:38:50 PM
<b>Docketed Date:</b>	6/22/2022

*Comment Received From: Rivian  
Submitted On: 6/22/2022  
Docket Number: 22-EVI-03*

**on California's Deployment Plan**

*Additional submitted attachment is included below.*



June 22, 2022

**Re: California NEVI Deployment Plan Development (22-EVI-04)**

Rivian thanks the California Department of Transportation (“Caltrans”) and the California Energy Commission (“CEC”) (together “the Agencies”) for the opportunity to provide comment on California’s Deployment Plan (“the Plan”) for the National Electric Vehicle Infrastructure Program (“NEVI”).

Founded in 2009, Rivian is an American manufacturer of all-electric adventure vehicles headquartered in Irvine, CA with several offices, service centers, and charging sites throughout the state. With over 12,000 employees across the US, Rivian’s focus is the design, development, manufacture, and distribution of all electric, zero emissions vehicles, specifically pickups, and sport utility vehicles (“SUVs”). Our R1T pickup, R1S full-size SUV, and commercial delivery van are all built in the US and displace some of the heaviest-polluting vehicle segments on the road. In addition to our vehicles, Rivian is also building out two complementary charging networks to support transportation electrification nationwide. The Rivian Adventure Network (“RAN”) is deploying fast chargers located along both popular routes and more remote, off-road, destinations, and the Rivian Waypoints Network (“RWN”) is focused on deploying level 2 charging across America’s parks and public lands to enable electric enable electric adventure in rural and remote areas.

Rivian offers the following comments regarding California’s Draft NEVI Deployment Plan for Caltrans/CEC consideration:

**Public Engagement.** We applaud California’s outline for robust and transparent stakeholder engagement and believe the state is balancing the need to move quickly to meet high-level state deployment and emissions goals, while also balancing the need to get sufficient input from the range of stakeholders. Ample and continued input will be critical to inform application processes and requirements while insuring cost-effective, efficient and scalable infrastructure is deployed throughout the state.

**Contracting.** Rivian thanks the Agencies for providing detail in the Plan around the application and scoring process for grant applications. We support the attention to fairness and equity across qualifying bids as a key goal for the Agencies as scoring criteria are developed. With this in mind, we encourage the Agencies to consider the following when developing scoring criteria:

- Continue to consider site upgrades given their potential to reduce costs and improve the efficient distribution of funds.
- Create applications and scoring criteria which enable equitable and fair comparison across established industry players and newer market entrants, including enabling equitable methods for newer entrants to prove the reliability and interoperability of their systems.



- If scoring criteria will support applications incorporating a greater than 20% cost share, we encourage the Agencies to publish publicly accessible reference resources documenting other funding opportunities, incentives and rebates to enable further equity across applicants.

**Equity Considerations.** We support the Agencies' plan to prioritize rural, low income, and disadvantaged highway segments where additional financial support will be needed given lower / intermittent electric vehicle traffic and potentially less available grid capacity. In addition, we strongly support the emphasis placed on prioritizing corridor segments that provide rural, low income and disadvantaged communities access to California's National and State public lands.

**Electric Vehicle Freight Considerations.** Electrifying both consumer passenger vehicles and commercial fleet vehicles are paramount in the transition to an electric transportation system. However, the accommodation of most commercial vehicle charging is materially different from the needs of consumer vehicles. Commercial electric vehicles are longer and wider, and typically leverage larger battery packs than consumer EVs. These attributes therefore require significantly different site designs and cable lengths as well as evaluation of grid capacity and dwell time. Finally, commercial drivers may require different amenities and therefore overall sites than consumer vehicles. These differences, along with the nascency of commercial electric vehicles utilizing highway charging on long-distance routes, necessitates an entirely different framework for charging plans. At a minimum, Rivian encourages California to consider charging infrastructure buildout for commercial electric vehicles in later years of the NEVI program and leverage other buckets of state funding in the meantime.

**Strategies for EVSE Data Collection & Sharing.** We strongly support unifying utilization and reliability data requirements for program applicants and encourage the CEC to share additional details on their thinking in this area with stakeholders as soon as is reasonable. In addition, we encourage the Agencies to consider the following:

- Limit additional requirements outside of what is already required under California Air Resources Board (CARB) EVSE Requirements and the recently published proposed technical guidance from the Federal Highway Administration (FHWA).
- Strategically evaluate the value of each data metric requested and examine where aggregated and/or anonymized data from applicants would accomplish the same end goal.

Overall, we request additional stakeholder meetings and engagement on this important topic as it is critical to balance both the analysis needs of the State with the business models and confidential business information of the applicants.

**Labor and Workforce Considerations.** Rivian thanks the Agencies for acknowledging the risk of uncertain workforce supply and strongly supports the plans to work with community colleges to



improve access to EVITP certification examinations. Ensuring the state has a sufficient supply of qualified workforce to meet installation demand is a critically important effort and has the potential to impact California's ability to meet its overarching transportation electrification and emissions reductions goals. Given its criticality, we encourage the Agencies to continually evaluate other strategies to improve EVITP's scalability to meet demand as well as consider waivers on a limited basis (geographically or time bound) if supply is deemed not adequate. Going forward, we request the Agencies track and include substantive details regarding progress on this topic in future annual updates to California's Deployment Plan.

Thank you again for the opportunity to submit feedback on the California's Draft NEVI Deployment Plan. We look forward to the continued stakeholder engagement as the Agencies finalize the high-level State Plan and turn to detailed application requirements and scoring criteria. Please contact Kelsey Johnson [kgjohnson@rivian.com](mailto:kgjohnson@rivian.com) with any follow-up questions or requests for additional information.