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Cool the Earth Comments on NEVI Pre-Solicitation Joint Workshop

Additional submitted attachment is included below.



Cool the Earth Comments on the National Electric Vehicle Infrastructure Pre-Solicitation Joint Workshop

Cool the Earth, a nonprofit organization, has worked for over a decade to educate consumers about clean electric driving and leads a national non-profit collaborative effort, Ride and Drive Clean. Cool the Earth appreciates the opportunity to provide comments on the CEC Pre-Solicitation Joint Workshop.

Cool the Earth has extensive driver-focused experience with public charging including DC Fast (DCFC), working with thousands of members of the public as well as with cities, agencies, NGOs, utilities, and CCAs. Unfortunately, our constituents frequently have encountered numerous reliability issues that prevent successful charging and less-than-ideal user experiences in terms of safety and comfort. Cool the Earth strongly recommends that the CEC solicitation include requirements that address reliability and user experience. Below are our specific comments.

Proposed Project Requirements

- The solicitation proposes to require that a restroom is available at all stations, but only during site business hours. We recommend that restroom availability needs to be 24/7/365.
- A minimum of 4, 150kW chargers are required per station. For stations along AFCs, we recommend fewer stations, but each with a larger number of DCFC ports and the capability to charge more vehicles simultaneously. We recommend that stations along AFCs have a minimum of eight (8) charging network-connected DCFC ports at each station and the capability of simultaneously charging at least eight EVs. This would improve economies of scale and be more aligned with driver expectations on longer trips along AFCs.
- CTE strongly supports the Operational Requirements of 97% uptime and a 5-year operations and maintenance plan. We look forward to learning more about the specific details regarding reliability, including enforcement mechanisms, at the upcoming CEC workshop that was announced during the presentation.
- The CEC indicated in the presentation slide deck that it is exploring Pay for Performance provisions. In concept, CTE is supportive of Pay for Performance to help ensure reliable operation and would appreciate the opportunity to learn more about the details of this proposal.
- The solicitation indicates that funding will not be available for the replacement of existing stations that were funded by public dollars if less than 3 years old. Given the high cost of the stations and the limited public funds, we recommend funding will not be available for the replacement of existing stations that were funded by public dollars if less than 6 years old.

Additional Minimum Requirements

CTE proposes that the CEC consider including the following additional minimum requirements as part of its solicitation.

- The kiosk and parking spot shall be covered to protect EV drivers and the kiosks from the elements.

- The station shall be monitored 24 hours per day
- Adequate lighting shall be provided per IES guidelines
- At least one kiosk at each station shall be accessible according to relevant ADA requirements
- The charging cable shall have a retraction line to support the weight of the cable
- The screen legibility and touch input shall follow similar product usability guidelines (e.g., bank ATM Design Guidelines).
- Parking shall be designed per local code requirements and shall accommodate a full-size EV without the vehicle intruding into the drive lane, with adequate space on both sides for easy access.
- The cable shall be long enough to reach the EV inlet ports of all EVs
- For stations along designated Alternative Fuel Corridors, at least one kiosk must be drive-through to allow charging of long vehicles or EVs towing trailers

Submitted by:

Carleen Cullen

Cool the Earth

Executive Director

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