

DOCKETED

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Noodoe Comments CEC-Caltrans NEVI Workshop 09.28.22

Additional submitted attachment is included below.



September 28, 2022

California Department of Transportation
1120 N Street
Sacramento, CA 95814

California Energy Commission
715 P Street
Sacramento, CA 95814

Subject: National Electric Vehicle Infrastructure (NEVI) Funding Program Pre-Solicitation Workshop Comments

To Whom it May Concern,

On behalf of Noodoe, an electric vehicle charging solutions provider, I am writing to submit comments on the National Electric Vehicle Infrastructure Funding Program Pre-Solicitation Joint Workshop held on September 7, 2022.

Noodoe provides Level 2 and 3 EV chargers as well as best-in-class EV charger operating software and customer experience. Noodoe is incorporated in the US, with offices in California, Texas, Taiwan and Australia.

Noodoe looks forward to competing for funding to help electrify California's designated charging corridors. We have concerns, however, that the definition of an "experienced" provider, as defined by the CEC at the September 7, 2022 workshop, will restrict many highly qualified, technologically advanced, newer to the market providers such as Noodoe. The proposed definition is "*...experience operating at least 20 DCFC connectors at a minimum of 3 sites in California since 2018.*"

Indeed, the number of DCFC stations added in the United States in two years (2020-21) is the same as the cumulative total number of DCFC stations installed in years prior to 2020. Many new companies emerged in the last 4 to 5 years, maturing their deployment in the past two.

- CEC's restrictive language will preclude newer, more innovative companies from participating in the program.
- This restrictive language will preclude some Disadvantaged Business Enterprises and Minority Owned Business Enterprises from participating, which conflicts with your strong commitment to Diversity.

- This restrictive language will drive up costs, by arbitrarily reducing the number of companies available to compete.

In reviewing your scoring matrix, cost is identified as the most important single item, as cost constitutes fully half of all available points. Team experience and qualifications is only 5% of available points. If cost is important, and we at Noodoe agree, more competition will advance more cost-effective solutions.

Applicants must already meet specific equipment and operational requirements which will ensure reliable infrastructure for consumers, making this restrictive definition unnecessary.

An alternative definition could be to require two years' experience operating networked chargers. This more reasonable period of time would still establish a track-record of performance, without unduly eliminating the number of qualified electric vehicle charging network vendors.

A second concern is the proposal to place corridors into groups. Noodoe believes a better proposal would be to conform the NEVI program to CALeVIP's, which seeks to have one site per application. As such, rather than grouping multiple charger locations into one contract, applicants should be allowed to apply for funding on a site-by-site basis. No single property owner is likely to have sites that fulfill all the real estate requirements proposed in this solicitation, therefore, this requirement should be eliminated in favor of an application process more in line with other successful state programs.

Noodoe's third comment is the cost share is too large and should be revisited. The purpose of the NEVI program is to provide a minimum of 50 miles between charging points on defined corridors. By requiring 50% funding for many of the locations, there will likely be significant gaps in your corridor chargers, particularly in more rural areas.

Thank you for the opportunity to share our thoughts. Your attention to our concerns is greatly appreciated.

Sincerely,



Senator Bob Huff (ret.)
Director of Government Affairs
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