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**ChargePoint Comments_20-TRAN-04_Electric Vehicle
Infrastructure Project Funding**

Additional submitted attachment is included below.



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California Energy Commission
Docket No 20-TRAN-04
715 P Street Sacramento, California 95814

Submitted to on-line portal:
<https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=20-TRAN-04>

Electric Vehicle Infrastructure Project Funding

ChargePoint appreciates the opportunity to provide comments on the proposed structure for the Convenient, High Visibility, Low-Cost Level 2 Charging (CHILL-2) grant funding opportunity as presented by The California Energy Commission (CEC) during the Pre-Solicitation Workshop held late September. 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 on multi-family properties. As ChargePoint continues to create the new fueling network to move all people and goods on electricity, we look forward to continued collaboration and partnership with CEC and hope the comments below help inform this process.

I. Charger Minimums

Chargepoint recommends reducing the proposed minimum of 500 Level 2 chargers installed per project from 500 to 300 ports, which we believe can still achieve the objectives of deploying a high-quantity of Level 2 chargers in high-visibility areas. While we are supportive of the CEC's goals for this GFO, we are concerned that the 500-port minimum, with at least 100 chargers per site type, will be too restrictive. While 500-ports may be more feasible for a city like Los Angeles or San Diego, it would likely be too many for a smaller city like Sacramento or Oakland.

II. Site Type

ChargePoint recommends eliminating the proposed minimum two site types per project requirement. While we understand the importance of diversifying charging use cases by providing various charging locations (site types) to accommodate EV drivers' unique charging needs, we believe the proposed site types could be subjectively problematic to differentiate and classify. As an example, a parking garage (that may serve retail) and a retail parking lot could serve the same use case within a one-mile radius. Additionally, the solicitation's aim to compare different use



cases or business models for level two charging at similar site types, located in proximity of one another, may be challenging to garner a comprehensive evaluation.

III. Proposed one-mile radius requirement

ChargePoint supports the CEC's commitment to enhance perception of level two charging access through high density, high visibility installations, however we are concerned that the proposed one-mile radius is too restrictive, and we recommend increasing the radius from one-mile to three-miles. Increasing the distance can still maintain the solicitations' goal of allowing for dense installations while resulting in a more competitive grant program.

IV. Project Readiness

ChargePoint supports the CEC's proposed project readiness requirements, that charger installations sites must be identified and include letters of intent. We do not however recommend that site host agreements be required at the time of application. In our experience, site hosts are typically not willing to invest the time to review and negotiate complex site host agreements until funding has been secured and projects are approved.

Thank you for your consideration of our comments. ChargePoint looks forward to continued collaboration to accelerate California's transportation electrification goals. Please do not hesitate to contact me at Margaret.larson@chargepoint.com if you have any questions or if we can provide additional information.

Sincerely,

A handwritten signature in black ink that reads "Margaret Larson".

Margaret Larson
Senior Manager, Public Private Partnerships
ChargePoint