

DOCKETED

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ChargePoint Comments on 19-TRAN-02

Additional submitted attachment is included below.



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July 30, 2024

Michelle Vater
California Energy Commission
715 P Street
Sacramento, CA 95814

RE: **ChargePoint Comments Regarding 19-TRAN-02: MDHD Zero-Emission Vehicle Infrastructure Solicitation Concepts**

Dear Michelle Vater,

ChargePoint, Inc. (ChargePoint) respectfully submits these comments to the California Energy Commission (CEC) regarding 19-TRAN-02: MDHD Zero-Emission Vehicle Infrastructure Solicitation Concepts. We appreciate the opportunity to provide input on these important upcoming solicitations.

Founded in 2007, ChargePoint is a leading global electric vehicle charging network headquartered in Campbell, California. To date, we have delivered 246 million charges, thus enabling ten billion electric miles and avoiding 410 million gallons of gasoline. At ChargePoint, EV charging is all we do, and we do it all. Passenger cars, delivery vehicles, buses, and more—we charge any EV, anywhere it goes. We have built a fully integrated portfolio of hardware, cloud services and support with the best technology in the industry. We offer solutions for home, government, multi-family, commercial, and fleet electric vehicle charging infrastructure. Additionally, ChargePoint has successfully deployed both level two and fast charging infrastructure along major highway corridors and within communities across the country while working in tandem with industry and government to enable a more accessible electric future.

Please see our comments below:

Concept 1: CRITICAL PATHS 2.0

ChargePoint supports CEC's proposition to release a second solicitation for the CRITICAL PATHS program. Providing funding to deploy charging infrastructure along medium- and heavy-duty (MDHD) freight corridors is critical to help the state achieve its ambitious climate goals. This funding is a necessary complement to existing federal programs focused on the buildout of charging infrastructure along corridors, such as NEVI and the Charging and Fueling Infrastructure (CFI) Program. We support the CEC's proposed flexibility regarding eligible applicants for this solicitation, recognizing that many complementary programs are often limited to public entities only. This will serve an unmet need that frequently sees many private entities excluded from grant funding opportunities.

ChargePoint respectfully requests CEC to reconsider making make-ready infrastructure costs ineligible for reimbursement. Such costs should, at a minimum, be eligible for reimbursement for applicants whose project sites are in areas where the local utility does not have make-ready programs available to assist

with these costs. This will level the playing field for applicants whose project sites are not in any of the three major investor-owned utilities' (IOU) territories. As an added benefit, this will encourage diversity of project site locations and applicant types.

We also agree with CEC's proposed requirement that each DC charger be at least 350 kW. Although comments were made during the workshop on July 16 that such power levels are not as conducive to charging medium-duty vehicles, we respectfully remind CEC that most of our state's heaviest freight corridor users are also our heaviest vehicles (Class 8 long-haul goods movement trucks). Being mindful of the large battery capacities of these vehicles in their electric platform, it is necessary to require DC chargers of at least 350 kW to enable drivers to charge as quickly as possible and get back on the road.

To address CEC's second discussion question on this concept, we have seen that utility interconnection delays and utility equipment lead times are two of some of the most significant barriers to developing MDHD charging sites. As an example, Southern California Edison (SCE) has stated during public webinars in recent months that projects of 3-10 MW (such as projects that would be proposed under CRITICAL PATHS) require at least 3 years of notice to the utility. Additionally, equipment such as switchgear continue to see lead times of up to 18-24 months in some cases, significantly delaying project timelines.

Concept 2: Implementation of MDHD ZEV Infrastructure Blueprints 2.0

ChargePoint supports CEC's added flexibility for round 2.0 of this solicitation to allow entities that did not participate in GFO-20-601 to submit applications under this new round. This will encourage a greater number and diversity of applicants to apply and foster competition under this solicitation.

To address the discussion question, "Should there be caps on how much CEC pays per charger?" ChargePoint respectfully recommends that CEC move forward with the proposed cost share (25%) approach rather than a specific dollar cap per charger. This will allow applicants greater flexibility in charger power levels, as individual charger costs vary greatly once power levels in the hundreds of kilowatts are reached.

Concept 4: ZEV Port Infrastructure

ChargePoint strongly supports CEC's intent to release a solicitation to fund the deployment of MDHD ZEV charging infrastructure for our state's ports. Projects funded under this solicitation will support recent federal programs such as EPA's Clean Ports Program and Clean Heavy-Duty Vehicles Program. Additionally, we agree with CEC's proposed eligible applicants for this funding opportunity, again noting that the inclusion of private entities answers an unmet need resulting from many grant programs specifically excluding such entities from applying.

For the tentative timeline of this solicitation, we advise CEC to extend the proposed deadline to submit applications from January 2025 to February 2025, if the solicitation is to be released in November 2024. This will allow applicants more adequate time to prepare competitive proposals given the expected scope and size of projects anticipated under this solicitation, and takes into account the various holidays occurring in November, December, and early January.

To address CEC's second discussion question on this concept, this solicitation can only succeed in assisting ports with meeting their zero-emission goals if it allows them the flexibility they require to propose and win funding for projects that fit their unique needs. To reiterate a phrase frequently quoted at the 2024 Port Electrification Conference in Long Beach: "If you've seen one port, you've seen one port." Each port



within California is vastly different from even its closest neighbors. To allow port applicants the flexibility they need to propose project scopes that uniquely meet their electrification goals is to ensure the impact and efficacy of this proposed solicitation. This can be accomplished simply by giving applicants the freedom to choose the number, type, and location of charging infrastructure to be installed under their projects, rather than mandating prescriptive scope requirements as CEC is proposing here.

In conclusion, we thank you for the opportunity to comment on these critical future programs and look forward to ongoing collaboration with the CEC to reduce carbon emissions through the continued electrification of our great state's transportation sector.

Sincerely,

A handwritten signature in black ink that reads "Claire Garcia". The signature is written in a cursive, flowing style.

Claire Garcia
Fleet Grant Development Manager
ChargePoint, Inc.