



**CHARGEPOINT COMMENTS TO THE CALIFORNIA ENERGY COMMISSION
ON THE 2014 DRAFT INTEGRATED ENERGY POLICY REPORT UPDATE
DECEMBER 8, 2014**

ChargePoint, Inc (“ChargePoint”) appreciates this opportunity to provide comments on the 2014 draft Integrated Energy Policy Report (“IEPR”). We applaud the California Energy Commission for dedicating this IEPR principally to the topic of transportation technologies and the importance of Alternative Fuel Vehicles to delivering the greenhouse gas reduction benefits required in meeting state policy goals under AB 32. ChargePoint has actively participated in the workshops to develop this IEPR and our input is recognized and referenced in the draft report.

ChargePoint is the world’s largest and most open EV charging network with more than 19,000 charging spots. Every 7 seconds, a driver connects to a ChargePoint station and more than 6.8 million charging sessions have been initiated. Drivers have avoided over 6,800,000 gallons of gas and 44,000,000 lbs of CO2 emissions. More than 144,000,000 electric miles have been driven on the ChargePoint® Network and ChargePoint stations have dispensed more than 48,000 Megawatt hours (MWh) of electric fuel.

California has an impressive history of implementing groundbreaking transportation policies which have then been replicated or expanded into other states around the country. This IEPR will help to further this successful track record. ChargePoint agrees that the policy goals outlined in this report, including the Governor’s goal of 1.5 million electric vehicles by 2025, require coordination between the private

sector, our customers and the government. ChargePoint supports the direction of this IEPR, specifically the need to coordinate with the CPUC on the role of utilities, the possibility of exploring alternative financing options, the need to address the significant challenges in the multifamily residential market, the need to improve permitting for charging stations, and the opportunity to utilize data. We will further expand on these points below.

Role of the Utilities and Coordination with CPUC

The IEPR correctly identifies a need to coordinate with California utilities on VGI deployment and on the development of Distributed Energy Resources plans at the California Public Utilities Commission (“CPUC”) as required by Assembly Bill 327. ChargePoint also encourages coordination between the CEC and the CPUC on the role of utilities as being defined through the Alternative Fueled Vehicles Order Instituting Rulemaking (R.13.11.07). ChargePoint has supported a Proposed Decision in this proceeding to expand the role of utilities to allow ratepayer investment in EV infrastructure.¹ We believe that CEC investments and CPUC actions should be complimentary and directed to the same market objectives.

The CPUC is currently considering pilot proposals filed by Southern California Edison (“SCE”) and San Diego Gas and Electric (“SDG&E”) to collectively invest more than \$500 million in EV infrastructure in their service territories. ChargePoint believes that the approach taken by the CPUC on these filings must be consistent with the approach taken at the California Energy Commission—which has always been to support a

¹ Opening Comments of ChargePoint, Inc. on Proposed Phase 1 Decision Establishing Policy to Expand the Utilities’ Role in Development of Electric Vehicle Infrastructure (December 4, 2014) pp.2-3.

competitive market for EV charging equipment and network services. If a monopoly investment dominates this sector, the CEC's millions of dollars in investments in EV infrastructure deployment and matching private funds would be marginalized. These efforts must be integrated.

ChargePoint urges the CEC to support a utility role limited to investing in "make ready" which is the transformer, service, meter, panel, conduit and wires needed for a charging station installation. Any utility investment must enable customer choice, innovation and a competitive market. The opportunity to bring the ratepayer funding to the make ready investments would rapidly accelerate deployment of charging stations, including in the MDU market which this IPER identifies as having barriers.

Alternative Financing for EV Infrastructure

ChargePoint supports the direction of the IEPR, specifically the need to leverage the funding with financing to maximize effectiveness, as well as the need to address the challenges in the MDU market as a priority for funding in 2015. The ARFVTP has been critical to deploying charging locations in California with more than 9,000 charging locations funded through this program. The IEPR states that "electric vehicle charging stations are an example of a market segment that appears ready for alternative financing mechanisms" and offers alternatives to grants such as revolving loans and loan guarantees. ChargePoint welcomes the opportunity to explore these different financing mechanisms and agree that a variety of funding mechanisms provides for a range of recipients to access the best available option for them. We are concurrently providing comments to the CEC and the California Pollution Control Financing Authority on the proposed EVCE financing program.

Focus on Multi Family Residential Market

The IEPR also recognizes the challenges to EV adoption that exists where the EV driver lives in a multifamily setting. Over 40% of the state live in MDUs, and in some regions that numbers are well over 50%. Financing should be targeted to funding for the “make ready” investments, including the panel upgrades, in MDUs. New products and innovative business models are being developed to address the market, however the upfront costs may still be prohibitive for some customers. This should be a priority for funding.

Need to Standardize and Streamline Permitting

ChargePoint appreciates the statements made in the IEPR regarding the cost of permitting for residential charging infrastructure. We also believe improvements are needed to reduce permitting costs and time to approve projects for commercial installations. ChargePoint supports the recommendation to work with the Governor’s Office to “standardize permitting templates and provide guidance on permit fees while recognizing local goals and resource constraints.”² Ideally these efforts would lead to the ability to process permits electronically and expeditiously. We would also encourage continued efforts towards streamlining permitting for certain projects that meet clear requirements for installation.

The Importance of Smart Charging

² 2014 Draft Integrated Energy Policy Report Update (November 2014) pp. 56.

ChargePoint appreciates the focus on vehicle grid integration (VGI) and smart charging in this IPER. We encourage the CEC to continue to foster innovation by encouraging use of state-of-the-art EV charging equipment and communication infrastructure. Smart charging can encourage and support individuals and companies that want to participate in wholesale markets for ancillary services and demand response. We would welcome the participation in future workshops on smart charging.

Funding for Manufacturing

The IPER mentions that the ARFVTP has funded 18 manufacturing projects to date but does not have any additional details on the importance of supporting manufacturing moving forward. ChargePoint would encourage the CEC to expand on this topic in the IEPR. It would appropriate to provide a specific recommendation in the report to ensure, based on the success of the awarded projects, that some funding is directed towards this space in the future.

Conclusion

ChargePoint again applauds the CEC for pursuing an IEPR focused on alternative transportation infrastructure. This report will be important to guide future public financing in this industry. We appreciate the opportunity to participate in development of this report and look forward to working with the CEC and other parties on implementing the recommendations made in this document.

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