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chargepoint.com

ChargePoint, Inc.
254 East Hacienda Avenue | Campbell, CA 95008 USA
+1.408.841.4500 or US toll-free +1.877.370.3802

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California Energy Commission
Re: Docket No. 20-IEPR-01
1516 Nineth Street
Sacramento, CA 95814-5512

Submitted to on-line portal:
https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=20-IEPR-01

Re: Comments on the CEC Draft 2020 IEPR Update

ChargePoint appreciates the opportunity to provide comments on the Draft 2020 Integrated Energy Policy Report (IEPR) and the State's commitment to "doubling down to accelerate ZEV deployment."[1]

ChargePoint is the leading electric vehicle (EV) charging network in the world, with scalable solutions for every charging need and for all of the places that EV drivers go: home, work, around town, and on the road. ChargePoint's network offers more than 127,500 places to charge, including 49,500 spots in California, and those numbers continue to grow. With thousands of customers in several verticals including workplaces, cities, retailers, apartments, hospitals, and fleets, ChargePoint provides an integrated experience enabling consistent performance, efficiency and reliability at every touchpoint whether one is using a mobile app, plugging into a charger, managing the station or analyzing charging data. On the network, drivers have completed more than 87 million charging sessions, saved upwards of 107 million gallons of fuel, and driven more than 2.6 billion electric miles.

ChargePoint delivers scalable solutions that enable businesses to support more drivers, add the latest software features, and expand their electric vehicle and fleet needs with minimal disruption to overall business. Hardware offerings include Level 2 (L2) and DC fast charging (DCFC) products, and ChargePoint provides a range of options across those charging levels for specific use cases including light and medium duty and transit fleets, multi-unit dwellings, residential (multi-family and single family), destination, workplace, and more. ChargePoint's software and cloud services enable site hosts to manage charging onsite with features like Waitlist, access control, charging analytics, and real-time availability. ChargePoint products are UL-listed, ENERGY STAR® and CE (EU) certified, and the modular design minimizes downtime and makes maintenance and repair more seamless.

[1] Draft 2020 Integrated Energy Policy Report Update, Volume I: Blue Skies, Clean Transportation at 2.

ChargePoint's primary business model consists of selling its smart charging solutions directly to businesses and organizations while offering tools that empower site hosts and station owners to deploy charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven and cloud-enabled capabilities that enable site hosts to better manage their charging assets and optimize services. For example, with those network capabilities, site hosts can view data on charging station utilization, frequency and duration of charging sessions, set access controls to the stations, and set pricing for charging services. These features are designed to maximize utilization and align the EV driver experience with the specific use case associated with the specific site host. Additionally, ChargePoint has designed its network to allow other parties, such as electric utilities, the ability to access charging data and conduct load management to enable efficient EV load integration onto the electric grid.

Disadvantaged and Low Income Communities

ChargePoint agrees that the State "must do more to engage and understand the local mobility and clean transportation needs of low-income and disadvantaged communities."[2] These communities face disproportionate impacts from air pollution and we encourage the CEC to consider changes to its current funding mechanisms to better address infrastructure deployments in these communities to reduce pollution and provide opportunities for cost savings through electric vehicles. In particular ChargePoint is supportive of allocating 50% of Investment Plan funds to benefit low-income and disadvantaged communities through a stand-alone and competitive grant funding opportunity (GFO). The GFO(s) should be designed to support the unique characteristics of these communities including strategic siting, community partnerships and cost-effectiveness. GFO-15-601 is a prime example of a program catered to the unique characteristics of a particular EV charging segment: corridor charging. GFO 15-601 ensured investments were made in the most critical locations, were supported by the local community and implemented by the most capable teams. The projects served as a catalyst for AB 1236 implementation to address local permitting challenges, supported jobs and enabled EV travel to many of California's rural and disadvantaged communities. GFOs should be leveraged to maximize benefits for low-income and disadvantaged communities, provide key insights and lessons learned and inform future investments in these communities.

Current funding opportunities such as the California Electric Vehicle Infrastructure Project (CALeVIP) incorporate minimum investment requirements for disadvantaged communities (DACs). However, CALeVIP funds are awarded to the quickest applicant which may not be the applicant that can provide the most value for the CEC's investment. Furthermore, CALeVIP does not guarantee that investments will reach low income communities (LICs). Leveraging qualitative and quantitative criteria to select awardees will ensure the most impactful projects are selected for award. This approach will also provide a mechanism to promote LIC investment through merit points and/or increased incentive amounts for LIC deployments.

[2] Ibid., 39.

Comprehensive Electrification

We appreciate the comments made in the June 11, 2020 IEPR workshop and agree with the general recommendations from the CEC to support electrification of vehicle ridership that includes vehicle ownership, rideshare, fleet operation in both the light-duty and medium- and heavy-duty segments. We encourage broader considerations on the impacts that fleet electrification may have on vehicle adoption. As more workplaces electrify their fleets, employees will get real work experience with EV, which we believe will drive great adoption in the personal light-duty segment.

Job Creation and Workforce Training

ChargePoint has employed hundreds directly and indirectly in California. We support direct employment in the sales, marketing, engineering, support, manufacturing, and maintenance of charging stations. Indirectly we support 3rd party retailers of our products and those providing installation services. As the CEC continues to explore these issues we note that each sector of the electric vehicle eco-system may require distinct solutions, applying analysis and lessons learned from the automobile sector may not translate well to other sectors in the eco-system.

Assessment of Charging Station Infrastructure

The deployment of charging infrastructure in California is an international success story. Charging station deployment has kept pace with EV adoption and as demand increases in the coming years, so will EV chargers being deployed. Figure 23 shows continued growth in all aspects of investment in charging infrastructure with the majority of growth coming from private investment.

ChargePoint agrees that it is important to ensure there is a "widespread, reliable, and easy-to-use network of charging infrastructure"[3] to accelerate the adoption of EVs. However, we question the assumption in Figure ES-5 that there are only 121,000 additional planned chargers through 2025. The CEC notes this shortcoming in their data stating that "[t]his predicted gap does not account for any investments in charging infrastructure that may be made without support from EVE, utility, or settlement funds."[4] ChargePoint encourages the CEC and other state agencies to work closely with the private sector to predict demand for and projections of installations rather than assuming a gap exist simply because of a lack of data.

ChargePoint agrees with the CEC that "continued fragmentation [of connectors] in the market confuses consumers"[5] and that connector standardization should be a "high priority"[6]. ChargePoint supports the CEC requiring standardized connectors for near term funding opportunities, particularly for light duty charging, while acknowledging the evolution of high-speed charging for medium- and heavy-duty may still occur in the future.

[3] Ibid., 7.
[4] Ibid., 78.
[5] Ibid., 85.
[6] Ibid.

Multiunit Dwellings
While ChargePoint agrees that more must be done to provide residents in multiunit dwellings access to charging infrastructure, we are unconvinced that entirely separate busines models are necessary. ChargePoint encourages Level 2 rebate programs that include appropriate levels of funding for chargers and the infrastructure, which might be higher for multiunit dwellings than other applications. ChargePoint also encourages Level 2 deployments in close proximity to high density multiunit dwelling communities. This may include locating public charging stations on-street, in parks, churches and other community locations.

Medium- and Heavy-Duty Vehicles and Infrastructure
ChargePoint supports the recommendations on page 75 related to medium-and heavy-duty vehicles and infrastructure. We encourage the Energy Commission to ensure that incentives, especially grants, for this market segment are made in a timely manner. This may require increasing staffing within the Energy Commission, careful review of third party grant administrators, and/or avoiding complicated joint funding arrangements with municipal utilities and regional air districts, all of which seem to have contributed to slow distribution of funds under the CALeVIP program for light duty vehicle charging infrastructure. Vehicle and infrastructure purchases are likely to be make separately and the incentives for both most be received by the end user within a predictable time frame. Vehicles and the charging infrastructure are mission critical for this segment and neither should be held up by the slow distribution of incentives for the other.

New Approaches to Funding Charging Infrastructure
ChargePoint welcomes further discussions on additional regulatory and funding mechanisms to spur private investment in charging infrastructure, particularly in disadvantaged and low-income communities.[7] However, we are concerned that the proposed "avoided cost of charging" design could have unintended consequences that could favor certain business models, misalign with other state efforts, and disincentivize innovation in the charging infrastructure space.

As discussions continue on alternative approaches to funding charging infrastructure ChargePoint believes it is necessary that any alternative approach ensure the following:

- **Provide a stable and predictable funding mechanism for site host.** Because each EV charging site is unique in many aspects, the cost of deploying charging infrastructure can vary greatly. It appears that in the "avoided cost of charging" proposal site host would be required to submit a speculative project into the reverse auction or complete a project and then submit the project into the reverse auction. Either of these scenarios is not ideal, in particular for independently owned and operated charging stations or the EVSPs that provide that hardware and software options. Furthermore, the reverse auction mechanism could encourage companies to site charging infrastructure based solely on cost, rather than on factors important to driver experience such as proximity to high traffic corridors, proximity to certain amenities such as food and leisure

[7] Ibid., 95.

activities, and in locations with complex interconnection requirements such has high density areas.

- **Empower site host choice in the EV charging services they wish to employ, even if those choices might not be least cost.** Site host install charging stations for a variety of reasons. Some install charging as a service to augment their core business while other may install charging with the intent of enabling vehicle-to-building or energy management capabilities. These functions which could be critical components for a site host, might not meet some interpretations of "lowest-cost". Additionally, some of the most critical infrastructure in the state may be most costly, including chargers in rural areas or in older properties. We encourage continued discussion to ensure that any funding mechanisms encourage a broad array of functionality in EV charging hardware and software and will encourage EV charging technology providers to continue to meet the needs of site host beyond the most basic task of charging.
- **Provide a level playing field for all businesses.** One reason that utility and CEC rebate programs have been wildly successful is that they support a range of business models equally, while allowing site hosts choice in equipment and services. With known and predictable funding all businesses are able to enter their products into the market for these rebate programs. In contrast, we are concerned that efforts from governments to assess projects "primarily on the public investment the EVSPs need to viably serve their charging project and enable electric miles" or otherwise the lowest cost is simply picking winners and losers based on a single criterion, cost.[8] Picking winners and losers based on lowest cost will harm the market, stall private investment and potentially have long-term damaging consequences to certain businesses.

Data Reporting Requirements

ChargePoint is supportive of continued discussions on the role of vehicle grid integration, however, we discourage additional data reporting requirements on private companies and operators of charging stations. Currently there are multiple efforts underway at the CEC to collect data that are in addition to mandates from CalDMS, CARB, and the CPUC. ChargePoint believes there is sufficient data available without placing additional requirements on companies to collect, verify, sort, and submit for a separate effort. Additional data requirements will add overhead cost for charging providers, distract from our core work of deploying infrastructure, and reduce funds available for core technology innovation in the charging infrastructure space.

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Thank you for the opportunity to provide these comments. For questions, please contact Justin Wilson at justin.wilson@chargepoint.com.

[8] Ibid.