



ChargePoint, Inc.

240 East Hacienda Avenue | Campbell, CA 95008 USA
+1.408.841.4500 or US toll-free +1.877.370.3802

August 30, 2018

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, California 95814

Subject: ChargePoint Comments on the Low Carbon Fuel Standard Second Notice of Public Availability of Modified Text and Availability of Additional Documents and Information

Dear Chair Nichols and Members of the Board,

ChargePoint respectfully submits these comments in regards to the California Air Resources Board (ARB) Low Carbon Fuel Standard (LCFS) Second Notice of Public Availability of Modified Text and Availability of Additional Documents and Information. Given Governor Brown's Executive Order B-48-18, which aims to have 250,000 public electric vehicle chargers installed by 2025 and five million zero emission vehicles (ZEVs) on the road by 2030,ⁱ enhancements and amendments to the LCFS Program in this rulemaking cycle are critical to reach the State's ambitious goals.

ChargePoint is the leading electric vehicle (EV) charging network in the world, with charging solutions in every category EV drivers charge, at home, work, around town and on the road. With more than 53,000 independently owned public and semi-public charging spots, including more than 32,000 in California, and thousands of customers (businesses, cities, agencies and service providers), ChargePoint is the only charging technology company on the market that designs, develops and manufactures hardware and software solutions across every use case. Leading EV hardware makers and other partners rely on the ChargePoint network to make charging station details available in mobile apps, online and in navigation systems for popular EVs. ChargePoint drivers have completed more than 39 million charging sessions, saving upwards of 40 million gallons of gasoline and driving more than 975 million gas-free miles.

Residential EV Charging – Incremental Credit Hierarchy

ChargePoint recommends amending the prioritization of the incremental credits for EV charging at Single-family residences, or eliminating the hierarchy altogether. The goal of the incremental credits is to encourage more charging when there is benefit to the grid and/or when there is lower carbon intensity of the electric fuel. Smart, networked chargers enable EV drivers to easily participate in charging that meets these goals. Additionally, networked charging equipment with embedded submeters are capable of tracking and collecting data that is equal to the revenue-quality meter data of a load-serving entity meter. Currently, the hierarchy is complicated and omits opportunities for EVSEs to capture credits outside of programs with LSEs. ChargePoint recommends the following hierarchy:

1. The Load Serving Entity (LSE) supplying electricity to the EV associated with the FSE ID and metered data has first priority to claim credits;
2. The manufacturer of the EV or EVSE associated with the FSE ID has second priority; and
3. Any other entity has third priority.



By flattening the second tier, there is an opportunity for EVSE manufacturers to generate incremental credits outside of programs with LSEs. Alternatively, if ARB eliminates the hierarchy, the incremental credits could be generated by the entity that registers the residence first, which would be a more simplistic and straightforward determination of the credit generator.

Residential EV Charging – Multifamily Categorization

ChargePoint is disappointed that ARB staff reverted back to not keeping EV Charging at Multifamily Residences as a separate category from single-family charging. Multifamily residences are extremely underserved when it comes to EV charging infrastructure. In fact, ARB recently published a gap analysis and found that “A gap of between 66,000 and 79,500 charging stations are still needed to meet the demand for charging stations in multifamily housing by 2025.”ⁱⁱ If EV Charging at Multi-family Residences is its own category, credits could go directly to the multi-family residences, reducing the payback period for their investment, and creating funds to purchase more chargers and cover installation costs. Structurally, multi-family residences are very different from single-family residences. Multi-family charging can often be located in the “visitor”, “mixed-use”, or “common” areas of a multi-family residence, which are closer to “non-residential” in the usage. In most cases it is not the “consumer” or “EV driver” that is making decisions about the charging infrastructure at the property, as they would in a single-family home. It is more often the property owner, manager, and/or HOA that is making the decisions on deploying infrastructure at a level with much more complexity than a single-family home. This leads to this market segment functioning much more similarly to the non-residential/commercial market, and therefore they should be categorized accordingly in the program. Without separation, it could be an area of significant verification confusion if vehicles can register credits from chargers with multiple users, including non-residents, given the many changes proposed in the residential EV charging modifications to LCFS. ChargePoint believes that allowing multi-family residences to be able to collect credits will promote equity, breaking the cycle of predominantly lower-income Californians from being locked out of clean technology due to energy poverty.

DC Fast Charging Infrastructure (FCI) Pathways

ChargePoint requests clarification on distinguishing between FSEs in instances of colocation. The FCI Pathways encourage colocation but capacity and utilization/throughput cannot comeingle. As written, it will be difficult to divvy up credits for the site between different FSEs. One recommendation is that the FCI Pathway Requirements include serial number by the OEM.

ChargePoint strongly recommends against establishing language regarding payment methods that preempt final SB 454 guidelines that will be adopted next year. If the LCFS program preempts or creates a different set of requirements, it could cause confusion, lack of participation in the program, or worse, violations because there are potentially two different sets of language/requirements around payment methods for public stations. Cross-referencing the current rulemaking will make it more streamlined and easier for EVSE manufacturers and site hosts to meet the requirements.

ChargePoint also requests clarification on Section 95486.2(b)(4)(G). At what point in the project development can a site apply for the FCI pathway? ChargePoint understands that the FCI pathway is only available for new sites, but is asking for clarity on what point in the process applications can be submitted. For example, planning, construction, utility interconnection, or permitting.

Data Collection

Given the changes proposed in this rulemaking cycle to the electricity portion of the LCFS program, ChargePoint recommends that ARB develop a streamlined data collection system. With thousands of chargers currently registered in the program, as well as a proposed Time-of-Use (TOU) program that would require hourly data reporting, the current system of emailing Excel files as back-up verification data is neither secure nor efficient. Additionally, we recommend creating a calculator, similar to The LCFS Credit



Price Calculatorⁱⁱⁱ, which would allow an FSE to estimate credit generation via the various credit generation opportunities being solidified in this current rulemaking.

ChargePoint appreciates the opportunity to submit these comments and looks forward to continuing to work with the Air Resources Board, as well as other stakeholders, on continuing carbon emission reductions associated with alternative fuels through the Low Carbon Fuel Standard program.

Sincerely,

A handwritten signature in black ink that reads "Amanda J. Myers". The signature is written in a cursive, flowing style.

Amanda Myers
Public Policy Manager
ChargePoint

ⁱ <https://www.gov.ca.gov/2018/01/26/governor-brown-takes-action-to-increase-zero-emission-vehicles-fund-new-climate-investments/>

ⁱⁱ <https://arb.ca.gov/cc/greenbuildings/pdf/tcac2018.pdf>

ⁱⁱⁱ <https://www.arb.ca.gov/fuels/lcfs/dashboard/creditpriccalculator.xlsx>