



Comments of ChargePoint, Inc.
Submitted to
Energy and Technology Committee
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By
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- Proposed H.B. No. 6030 AN ACT CONCERNING ZERO-EMISSION VEHICLES IN CONNECTICUT.
- Proposed H.B. No. 6031 AN ACT CONCERNING ELECTRIC VEHICLES

ChargePoint, Inc. (“ChargePoint”) appreciates this opportunity to provide comments on the opportunity to initiate legislation in Connecticut to support the deployment of Electric Vehicles and EV Infrastructure deployment.

Background on ChargePoint

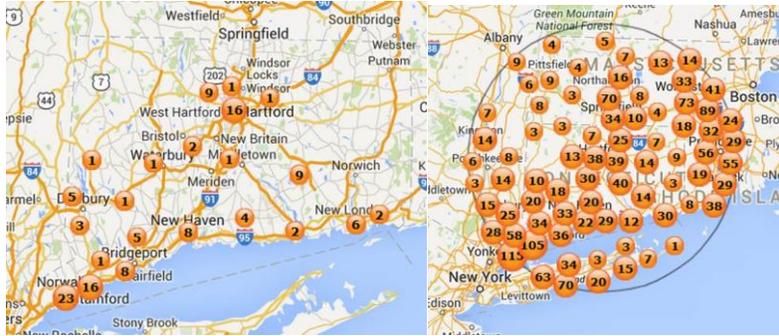
ChargePoint is the world’s largest and most open EV charging network with more than 20, 000 charging spots. ChargePoint is the largest and most open electric vehicle (EV) charging network in the world, with more than 20,000 charging locations. ChargePoint’s real-time network information including the availability of charging locations throughout the nation is available through the ChargePoint mobile app, online and via the navigation systems in top-selling EVs including the new BMW i3 and the Nissan LEAF.

Ranked #1 by leading independent research firm, Navigant Research, ChargePoint makes advanced hardware and best-in-class cloud based software. A driver connects to a ChargePoint station every 7 seconds and by initiating over 7.3 million charging sessions, ChargePoint drivers have saved over 6.4 million gallons of gasoline and driven over 155 million gas free miles.

ChargePoint in Connecticut

ChargePoint has been an active participant in state and federal regulatory proceedings and legislative hearings throughout the United States to provide expertise and insight into policies that support the adoption of electric vehicles. We have participated in DEEP workshops on policies, and have met with the Connecticut Green Bank to discuss financing opportunities to leverage state funding to achieve emissions reduction goals as well as create economic opportunities by supporting new technologies such as smart charging infrastructure.

The maps below show the publicly accessible charging ports installed in Connecticut as of February of 2015 (79 stations, 125 ports) and close to 2,000 EV drivers using the ChargePoint network in the region.



In the comments below, ChargePoint outlines recommendations for legislative initiatives for Connecticut in order to meet the State’s goals for EV deployment and specific actions DEEP, PURA and the distribution companies can take to immediately accelerate EV infrastructure development in Connecticut.

The time is right for the legislature to recommend policy initiatives to accelerate expansion of EV infrastructure development in Connecticut. Connecticut has the potential to be a leader in advancing electric vehicles. Governor Malloy recently joined seven other states in a collective commitment to bring 3.3 million zero emission vehicles on the road by 2025.¹ ChargePoint joined in with 60 organizations in the region to encourage specific actions to enable the goal of 3.3 million zero emission vehicles on the road by 2050 and to establish the infrastructure that will adequately support this number of vehicles.² In addition, the efforts cited in the 2014 IRP for Connecticut, including TOU rates, education and outreach and the ground breaking “EV Rate Rider Pilot” are great examples of policies to support EV adoption.

Recommendations:

- The Legislature should set a specific goal for EV Infrastructure needed to support the ZEV MOU and an Official Commission or Task Force to enable goals. An official task force or commission, such as those currently operating in Maryland, Massachusetts, and Vermont, is a strategic way for a state to advance EV policies. Stakeholders should include agency leadership, utility companies, car manufacturers, EV infrastructure companies, and public interest advocacy groups.

ChargePoint has been appointed and is actively participating in the ZEV Commission in Massachusetts as well as the Maryland Electric Vehicle Infrastructure Council. We are also active in NESCAUM and Clean Cities. Our sole mission is to enable EV Adoption through ubiquitous EV Charging Infrastructure. Market collaboration is an essential element to successful EV adoption and infrastructure deployment.

- The Legislature should consider financial incentives for electric vehicles, such as rebates, that are supported by predictable and reliable funding streams, such as RGGI funds.

¹ See “Governors Announce Bold Initiative to Put 3.3 Million Zero-Emission Vehicles on the Road by 2025,” <http://www.ct.gov/deep/cwp.view>
² December 17, 2014, “Capturing the Economic, Environmental and Public Health Benefits of Electric Vehicles”

- The Legislature should direct the Connecticut Public Utilities Regulatory Authority (PURA) to enable a competitive market for EV Charging equipment and services eliminate regulatory barriers to infrastructure ownership and operation.

First, and most importantly, individuals and companies contemplating making an investment in providing EVSE and EV charging services to Connecticut PEV drivers will only do so if they have a clear understanding of the regulatory status of Charging Stations and related equipment. Regulatory uncertainty is a barrier to private investment in infrastructure and services. State regulators in other states (now 17 States) have recognized this, and have made issuance of an order addressing jurisdiction a priority. In some instances, a regulatory determination clarifying that EVSE and EV service providers will not be subject to utility regulation has been codified through legislative action.³

- The PURA should open up a proceeding to explore create a utility framework to increase adoption and maximize benefits of EVs. Benefits of electric vehicles for owners and the electric grid as a whole can be optimized through innovative utility programs, including electricity rate design, demand response and other vehicle-grid integration programs, grid planning and targeted infrastructure investments, and vehicle registry reporting with appropriate privacy protections
- Legislators should encourage and support distribution utility programs that address near-term obstacles, and that leverage utility capabilities and expertise to expand private investment in EV charging. Pilots or proposals should be on a scale to substantially expand EV charging infrastructure to meet goals for EV adoption established in the ZEV MOU. A proceeding should be opened at PURA to explore the role of the utility in EV Infrastructure.
- The legislature should open hearings to explore and understand the new technologies and services available in the market to lower costs for EV adoption and maximize benefits to the grid. As the State investigates smart grid deployment, an understanding of “smart” charging equipment that enables interface with managed charging networks and the grid should be part of the “smart grid investment.” The smart charging technology should be enabled through third party cloud to cloud interface with the utility. As EV adoption increases, charging in high-demand areas without proper incentives and managed charging could lead to increasing impacts on the grid. However, there is broad recognition that properly managed EV charging load also has the potential to yield improved electricity system asset utilization in the long term. Managed charging is the key to avoiding negative impacts on the grid and optimizing EV charging as a demand management tool. The Department should do everything possible to support infrastructure development on the utility side that will enable and encourage customer investment in smart charging – especially in the key multi-unit residential and workplace sectors..
- Legislation should recommend short term grant funding and policies encouraging and supporting PEV charging at Multi-family properties and workplaces. In key urban areas around the country, ChargePoint has observed that the opportunities and incentives for consumers to purchase EVs are expanding. At the same time, there is a significant EV infrastructure “gap” – particularly in developing multi-unit residential (“MUD”) and workplace charging. The majority of charging occurs in the home and workplace.

³ See AB 631 in California

- The Connecticut Green Bank should open an RFP to support financing of EV Infrastructure leveraging public dollars most efficiently to support DC Fast Charging programs. ChargePoint recently announced a groundbreaking partnership with automakers VW and BMW to facilitate DC Fast Charging networks in the Eastern corridor, including Connecticut. The ability to bring public and private partnerships together with innovative project financing would be a game changing opportunity for the State to support regional efforts. The State is already piloting the “EV Rate Rider” program to provide an interim rate solution to demand charges to facilitate the operation of the fast charging stations in early years.

Thank you for the opportunity to provide these comments for the record. ChargePoint is available to provide further insights and testimony on Charging Infrastructure policies that will support EV Adoption.