

ChargePoint Inc. National Electric Vehicle Infrastructure Formula Program Recommendations

The Infrastructure Investment and Jobs Act (“IIJA”) includes critical investments for new programs to address climate change, including the historic NEVI Formula program to enable states to place charging infrastructure along alternative fuel corridors. We offer the following comments to help FHWA and the Joint office of Energy and Transportation (“Joint Office”) develop the final minimum standards for the NEVI program. ChargePoint is pleased to provide the following recommendations and stands ready to work with the Administration to meet our nation’s climate and transportation electrification goals.

- **Allow for flexibility in power levels and number of ports**
 - Requiring levels above 150kW would disadvantage rural, western, and Tribal lands
 - While 150kW or 350kW may be appropriate for some locations, 50kW or 100kW may be suitable for sites that lack access to power, have high utility demand charges, or not enough projected utilization to provide a positive return on investment within a reasonable timeframe.
 - Flexibility should be given for areas and stretches of highway where a one-mile distance from highway is not tenable. Distance should be measured by way of driving and not “as the crow flies.”
- **Contactless payment is the best payment choice**
 - Contactless payments for credit and debit cards, and NFC-based charging network accounts, offers a safer, more reliable, accessible solution for an elevated driver experience.
- **Allow for flexibility in labor requirements as EVITP and RAP programs scale up nationwide**
 - Only two pathways to qualification would limit entry to the broader EVSE workforce, risking delays to equipment installation.
- **Clarify scenarios where chargers are considered up, and consider proportional uptime credit to support resiliency and encourage redundancy**
 - We recommend that a charger be considered “up” when a charging port is able to successfully dispense electricity as “designed by the manufacturer, configured by the station owner within state NEVI requirements, and as requested by the electric vehicle being charged.”
 - Using our proposed formula, if a charger is required to provide power at least 150kW, however due to a partial outage it is only able to dispense at 120kW for a period of 48 hours, the charger would have an outage time of 9.6 hours, rather than 48 hours $[48 * (1 - 120/150)]$ – outlined on page 14 of full comment.
- **Consider making changes to the data submittal requirements to reduce burden on state DOTs and protect EVSE provider’s CBI**
 - Consider requiring annual data submissions rather than quarterly to relieve burden on State DOTs.
 - The bulk of the data requested is extremely commercially sensitive and could harm grant recipients of EV charging operators – pages 12 and 13 of our full comment outline a proposed structure