

ChargePoint

Thank you for the opportunity to provide comments on the Environmental Mitigation Trust funding allocated to Washington under Appendix D of the VW Settlement. ChargePoint is the world's largest and most open EV charging network with more than 43,000 level 2 and DC fast charging spots. Every 2 seconds, a driver connects to a ChargePoint station and by initiating over 31.6 million charging sessions, ChargePoint drivers have driven over 744 million gas free miles.

Light Duty EV Supply Equipment (EVSE)

Appendix D of the VW Settlement allows each beneficiary to invest up to fifteen percent (15%) of its allocation of Trust Funds on costs associated with deploying new, light duty EVSE. ChargePoint recommends that the state dedicate its entire 15% carveout towards electric vehicle charging infrastructure. We recommend that the following features be included in a light duty EVSE program:

1. Incentives should be structured simply through rebates, vouchers, or a straightforward grant program;
2. Support competition and allow multiple vendors and business models to participate in any program;
3. Require site hosts of charging stations to have "skin in the game" and provide private match, which will stretch the value of the investment and lead to more efficient siting of infrastructure;
4. Encourage data collection that could be shared with state agencies for planning purposes, enabled through the use of networked smart charging stations;
5. Coordinate with other state and utility programs;
6. Seek to coordinate with neighboring states to establish EV fast charging corridors, including those identified by the FAST Act; and
7. Focus funding on areas of greatest need include workplaces, multifamily housing, and disadvantaged communities.

Non-EVSE Appendix D Funding

For the non-EV charging station Environmental Mitigation Trust funding, ChargePoint encourages the state to focus all 85% on electrification over other fuel sources, which will lead to the greatest transportation emissions reductions. Given currently available technology, ChargePoint encourages the state to focus on electric buses and medium duty transit vehicles. While we support all forms of electrification, ChargePoint particularly encourages investment in vehicles that have the ability to charge on standard EV charging stations. This will allow public light duty fast charging stations to be leveraged for bus charging and other fleet needs. Possible bus electrification programs could support regional, municipal and school bus fleets.

Thank you for considering our comments. If you have any questions, please contact me at dedrick.roper@chargepoint.com.

Sincerely,
Dedrick Roper
Director, Public & Private Partnerships
ChargePoint