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August 22, 2023

Hon. Michelle L. Phillips
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza, Agency Building 3
Albany, NY 12223-1350

RE: Comments of ChargePoint, Inc. in Case No. 22-E-0236– Proceeding to Establish Alternatives to Traditional Demand-Based Rate Structures for Commercial Electric Vehicle Charging

Dear Secretary Phillips,

ChargePoint, Inc. ("ChargePoint") appreciates the opportunity to submit these comments regarding the Joint Utilities' Electric Vehicle Load Management Technology Incentive Program as submitted in the above-referenced docket on May 19, 2023.

ChargePoint acknowledges that the request for comments as issued in the New York State Register Notice of the Proposal by Electric Utilities for an Electric Vehicle Load Management Technology Incentive Program requested feedback by August 21, 2023. We respectfully request the consideration of these comments despite their delayed filing.

Please don't hesitate to reach out with any questions.

Sincerely,

/s/Matthew Deal
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ChargePoint

About ChargePoint

ChargePoint is a world-leading EV charging network, providing scalable solutions for every charging scenario from home and multifamily to workplace, parking, hospitality, retail, and transport fleets of all types. ChargePoint's cloud subscription platform and software-defined charging hardware is designed to enable businesses to support drivers, add the latest software features and expand fleet needs with minimal disruption to overall business.

Background

On May 19, 2023, the Joint Utilities of New York (JU) submitted a Proposal to terminate the Per-Plug Incentive (PPI) Program and redeploy funds to support a new Load Management Technology Incentive Program (LMTIP).[1] ChargePoint offers these comments to express support for specific elements of the JU's LMTIP Proposal as filed in Case 22-E-0236.

Comments

A. Support: JU's broad approach to LMTIP eligibility.

The JU's LMTIP proposal correctly observes that different EV customers tend to have different goals for advanced load management (ALM). In ChargePoint's experience, customers invest in networked charging equipment as load management solutions for a variety of reasons, including:

- **Peak shaving.** The customer sets a maximum charger curtailment percentage that determines how much charging load should curtail while still ensuring EVs receive needed power. Fleet customers in particular are incentivized to consider peak shaving to limit the monthly per-kW peak and reduce electricity costs to fuel their fleet.
- **Load balancing.** At capacity constrained sites, customers can utilize load balancing to prevent overloading and reduce the need for costly and time-consuming electrical panel upgrades. Load balancing can also be helpful to partially energize sites where additional capacity is needed but not available. If a site host is waiting on a multi-year utility-side upgrade, they may be able manage load on site to utilize existing capacity in the meantime to energize a portion of needed chargers.
- **Power sharing.** Power cabinets that enable power sharing not only improve load management, but deliver a high-quality EV charging experience, particularly at public DC fast chargers (DCFC). For example, ChargePoint offers a power-sharing solution that dynamically allocates power according to the power requested from the EV. Because EVs have dynamic charging curves (i.e., power of DCFC charging session tapers down over time), smart load management may more efficiently allocate power to drivers plugging in at different times and states of charge without compromising charging speed.

[1] Case 22-E-0236, Proceeding to Establish Alternatives to Traditional Demand-Based Rate Structures for Commercial Electric Vehicle Charging, Joint Utilities Electric Vehicle Load Management Technology Incentive Program ("LMTIP" or "Proposal") (May 19, 2023).

ChargePoint supports the JU's recommendation for a broad approach to LMTIP eligibility, including incentives for on-site storage, advanced load management (ALM), energy management systems (EMS), and hardware that enables power-sharing.[2] The long-term success of EV load management programs, such as the LMTIP, depends on maximizing value to the customer (i.e., the site host) so that grid benefits may be unlocked at lowest cost. Broad program eligibility, as proposed, will support customer choice by empowering customers to select the ALM solution that best meets their needs. Because customers vary in their ability to engage in direct load management (fleet vs. public vs. workplace), there is no "one size fits all" load management solution. For this reason, broad eligibility will encourage competition and innovation in the EVSE industry to meet customer needs for different segments.

B. Support: One-time upfront payment for ongoing ALM software costs.

ChargePoint strongly supports the JU's proposal to offer LMTIP incentives for ALM software as a one-time upfront payment for ongoing costs up to a period of three years. Though software or "networking" costs are incurred on an ongoing basis, an upfront incentive will appeal to site hosts and encourage participation in the LMTIP, particularly for small businesses and fleets more sensitive to the high upfront costs of EV infrastructure deployment. In addition, offering software incentives on an upfront basis will allow customers to compare the relative costs and benefits of different load management technologies supported by the LMTIP on an apples-to-apples basis.

C. Recommendation: JU should clarify how they will exercise discretion to establish different incentive levels.

According to the JU's proposal, LMTIP incentives may cover up to 90% of eligible technology costs, or 100% in disadvantaged communities (DACs).[3] The JU indicate that incentives will initially be set by each utility based on costs observed and available budget, starting at 50% for the upstate utilities. However, the actual awarded incentive values will be determined at the JU's discretion, based on the justification that "Different incentive levels may be appropriate to: (1) address the cost ranges; (2) balance program impacts and budgets; and (3) support technologies that enable flexibility to reduce load at peak times."[4]

It is unclear whether the JU's discretion will consider the type of load management technology, or project-by-project according to grid capacity constraints at each particular site. ChargePoint requests that the JU provide greater clarity and transparency on which factors will determine incentive levels, particularly if incentive levels vary for customers within the same service territory for reasons other than their status as DACs. Such clarity is important for customers to understand expected LMTIP incentive values, accurately assess financial viability of different load management options, and select the eligible technology that is most appropriate and cost-effective for them.

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[2] Proposal at 7.

[3] Proposal at 4.

[4] Proposal at 5.