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VW Settlement
Department of Natural Resources
and Environmental Control
Division of Air Quality
100 W. Water Street, Suite 6A
Dover, DE 19904

RE: Comments on Delaware's Volkswagen Settlement Beneficiary Mitigation Plan

ChargePoint is pleased to provide written comments to the State of Delaware regarding the best use of funds stemming from the VW settlement and the State's allocation from the Environmental Mitigation Trust (Trust). The Trust funds provide a significant opportunity for the State to mitigate the environmental harm VW diesel vehicles caused, as well as advance key transportation segments that produce long-term benefits to the State and its communities.

In summary, ChargePoint recommends that Delaware prioritize investment of Environmental Mitigation Trust funds into projects utilizing electricity as a fuel and that utilize a standard connector. We strongly support Delaware's commitment to the maximum allowable 15% of its Trust allocation towards smart, light-duty electric vehicle (EV) charging infrastructure. We believe that this investment in transportation electrification significantly contributes to the NO_x mitigation goals of the Environmental Mitigation Trust, and NO_x reductions from charging sessions are easily and empirically calculable. Moreover, funding for EV infrastructure is needed to meet the demands of today's 1,200 plug-in electric vehicles¹ in Delaware, let alone support the exponential growth of EVs forecast for the years to come. In a state that currently has just 105 public charging outlets², this small portion of the investment could lead to hundreds of charging stations deployed in communities across Delaware, potentially increasing publicly available charging spots by nearly 400%.

ChargePoint is the world's leading electric vehicle (EV) charging network, with charging solutions for every charging need and all the places EV drivers go: at home, work, around town and on the road. With more than 48,400 independently-owned charging spots and thousands of customers nationwide, ChargePoint drivers have completed more than 36 million charging sessions, all powered by the local grid, and more than 834 million miles have been driven on charges from our network. In addition, there are currently 71 public ChargePoint charging spots in the State of Delaware.

Bottom-line reasons to commit 15% for charging infrastructure in Delaware

1. 15% for charging infrastructure would deploy hundreds of charging stations across Delaware.
 - Charging infrastructure is the most cost-efficient category for investment under the Trust.
 - EV charging stations can be deployed flexibly, with deployments easily tailored to State priorities and leveraging strong private sector demand.

¹ IHS/Polk 2017

² Alternative Fuel Data Center. U.S. Department of Energy. www.afdc.energy.gov. April 2018



- Smart charging can give the State real-time insights into EV charging and transportation trends.
 - Within months, hundreds of charging stations would be installed and operational, update constantly over air.
2. 15% for charging infrastructure would provide a measurable and significant annual NOx mitigation.
 - EV charging is the only category that offers real-time NOx mitigation measures.
 - Captures data on kilowatt-hours consumed, which can be easily converted to electric miles driven.
 - Charging infrastructure is the only eligible mitigation action that will increase NOx mitigation over time with greater EV adoption and a cleaner electric grid.
 3. 15% for charging infrastructure will make Delaware a leader in advanced transportation technologies.
 - 23 States have already determined EVSE as part of their draft or final beneficiary mitigation plans.
 - Current infrastructure is not adequate to meet the needs of today's EV drivers and prepare for future projected growth.
 - States are currently competing for preparedness in electrification, and Trust funds provide a unique opportunity for Delaware to lead and become a target for investment.
 4. 15% for charging infrastructure is part of a resilient transportation sector.
 - Charging is powered by the grid and keeps transportation fuel local.
 - Transportation fuel diversity mitigates risks for Delaware and its drivers.
 - Infrastructure is currently needed along evacuation routes, in order to address range security at a time of emergency.

Delaware Beneficiary Mitigation Plan Questionnaire

1. Do you support the three-phased approach over a three year time period? If not, please provide suggestions on how the funds should be distributed and spent.

ChargePoint supports the phased approach DNREC proposes, but encourages DNREC to support electric vehicle service equipment (EVSE) in the first funding phase. With over 1,200 plug-in electric vehicles in Delaware and only 105 public charging outlets, there is a near-term need for investment in EV charging.

A simple rebate program for networked, Level 2 charging stations could lead to hundreds of additional charging spots deployed in a matter of months. For example, a rebate program providing up to \$7,000 per dual port Level 2 charging station could lead to more than 400 new charging spots:

- \$1,400,000 (Trust funds) ÷ \$7,000 (Rebate) = 200 dual port charging stations
- 200 (dual port charging station) x 2 (charging ports) = 400 charging spots

This simple approach could lead to nearly 400% more publicly available charging spots. No other eligible mitigation action provides the ability to accelerate the State's transition to cleaner fuels like EV charging stations.



2. What is the appropriate cost share for the school buses in Phase 1? Should the cost share be 25%? Or 40%? Or some other percentage?

ChargePoint reserves comment on the appropriate cost share for school buses in Phase 1.

3. Should funds be set aside for particular categories in Phase 2 and Phase 3? If so, what categories? Why?

ChargePoint recommends funds be set aside for projects utilizing electricity as a fuel and that utilize a standard connector. Under the terms of the Environmental Mitigation Trust, funds used for medium and heavy-duty fleet vehicles may cover the cost of the vehicle and associated charging infrastructure. ChargePoint notes that some electric buses and trucks have the ability to charge on standard charging stations, which may also be used for light-duty vehicles. Investing in those models and associated infrastructure will allow public light-duty charging stations to be leveraged for bus charging and other fleet needs.

The Delaware Transit Corporation is already adopting electric bus models, and as more electric truck and forklift models become available over the 10-year investment horizon of the Trust, greater adoption is expected in those categories as well. Other agencies are exploring similar procurements recognizing the benefits of moving medium and heavy-duty fleet vehicles to electric drivetrains. For example, electric buses get the equivalent of 21 miles per gallon (MPG), compared to 4 MPG in conventionally fueled buses. Every mile driven in an electric bus will save taxpayers about 60-70% of what they would have paid with a diesel engine, per mile. Prioritizing projects that utilize electricity as fuel and standard charging connectors will help accelerate the adoption of these technologies and amplify the economic and environmental benefits.

4. Is it appropriate for this program to have cost shares equivalent to the Diesel Emission Reduction Act (DERA) Program?

ChargePoint has no comment on cost shares related to the DERA Program.

5. The criteria for evaluating applications were provided. How should Delaware consider the following factors, and what other factors should be considered? :

ChargePoint has no comment on the proposed phase 1 and phase 2 evaluation criteria. We look forward to the opportunity to provide comments on light-duty EVSE evaluation criteria when DNREC makes proposed criteria available for public comment.

6. Are the point values assigned appropriate? If not, what should they be?

ChargePoint has no comment on the proposed phase 1 and phase 2 point values. We look forward to providing comments on light-duty EVSE point values when DNREC presents them for public comment.

7. DNREC will conduct public outreach through in-person public meetings, presentations to stakeholder groups, Facebook posts, tweets, written comments and traditional media. What additional modes and methods of outreach, if any, should DNREC consider?



DNREC's proposed public outreach channels are sufficient and ChargePoint appreciates the opportunity to provide feedback and recommendations.

Conclusion

Thank you for your consideration of ChargePoint's comments. ChargePoint looks forward to being a resource to DNREC as it charts a course for Environmental Mitigation Trust funds to meet the needs of Delaware's communities.

Sincerely,

A handwritten signature in black ink, appearing to read "David Schatz".

David Schatz
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