



ChargePoint, Inc.

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December 1, 2021
Wyoming Department of Transportation
5300 Bishop Blvd.
Cheyenne, WY 82009

Subject: ChargePoint's Response to RFI NO. 22-011CS Zero Emission Vehicle Infrastructure Plan

Dear Ms. Schrinar:

ChargePoint is pleased to provide this response to the Wyoming Department of Transportation's RFI pertaining to your Zero Emission Vehicle Infrastructure Plan. ChargePoint is one of the world's leading EV charging networks, bringing charging to more people and places than ever before. ChargePoint currently operates over 170,000 total charging spots globally, including roughly 3,000 DCFC. Approximately 35 of these charging spots are in Wyoming including 3 DCFC.

ChargePoint was founded in 2007 by a group of entrepreneurs that anticipated the EV revolution. With extensive experience in technology and design from leading global companies, ChargePoint is building the smart network that keeps the EV industry moving forward. For the past 14 years, our commitment to EV charging—and only EV charging—enables us to offer the best electric fueling experience across every vertical whether it be at home, work, around town, or out of town. ChargePoint's Level 2 and DCFC stations have set the standard for quality, reliability, and durability with our customers and the industry.

We thank you for the opportunity to respond to this RFI and please feel free to reach out if you have any questions.

Sincerely,

John Schott

A handwritten signature in blue ink that reads "John Schott".

Director, Grant Development
ChargePoint
203-313-3408
John.schott@chargepoint.com



2. TECHNICAL RESPONSE

Respondents are asked to provide the following information within the following categories:

1. Infrastructure Installation, Placement, and Operation

a) What considerations should be taken into account when developing DCFC or hydrogen refueling stationing plans?

While there are many considerations that should be taken into account, at a high level one of the most important ones would be supporting long distance travel across Wyoming's highway corridors. A plan that includes Wyoming's most traveled corridors and routes that support tourism and ensuring DCFC availability at frequent enough intervals is critical.

b) How does corridor development and funding help or hinder statewide infrastructure emplacement?

In Wyoming and other states where DCFC infrastructure is limited, grant funding can help to build the backbone of a DCFC network or fill in critical gaps needed to travel from one end of the state to the other.

c) How close or far from major travel routes should refueling and charging stations be located?

Within one mile is preferred, although flexibility should be provided in remote and rural areas where there may not be a suitable option to locate DCFC within a mile of a highway interchange or exit. Other states have set a maximum limit of five miles while stating a preference for 1 or 0.5 miles and developed scoring criteria accordingly.

d) Are there any additional environmental, safety, or other issues that must be addressed (parking, access, amenities, future expansion)?

Sites should be safe, provide dusk to dawn area lighting, 24/7 access to DCFC, onsite or nearby amenities, and cellular service to name a few. Future expansion of the site to support additional DCFC is also an important consideration. And while Wyoming and most states with the exception of California have not established specific ADA requirements for EV charging, Wyoming may want to consider additional accessibility considerations beyond what is required by the local authority having jurisdiction and allow any additional cost for ADA compliance to be eligible for grant funding.

e) As a REV West signee, Wyoming voluntarily agreed to mutual coordination of signage and other common infrastructure, are there any other considerations necessary outside of the REV West agreement?

The REV West Voluntary Minimum Station Standards include many if not most of the important considerations. ChargePoint agrees with these minimum standards but would like to emphasize supporting multiple payment options and not requiring any specific technology such as chip and



pin. Allowing businesses installing EV charging infrastructure the ability to choose the best payment methods for their particular situation is critical. Businesses offering EV charging must balance accessibility, reliability, and security when providing critical fueling services.

f) How can revenue be collected from users after refueling?

Revenue or driver fees are collected by the network providers on behalf of the charging station owners and operators. ChargePoint holds the most stringent level of certification available in the payments industry, having been audited by an independent PCI Qualified Security Assessor (QSA) and found to be in compliance with the Payment Card Industry Data Security Standard (PCI DSS) as a service provider.

g) If the strategy is route or corridor based, what considerations should be given to prioritizing route or corridor build out?

If the strategy is route or corridor based some considerations may include focusing on the most traveled routes/corridors and ensuring proper spacing between sites to enable long distance travel. Given the importance of tourism in Wyoming you may also want to consider prioritizing routes or corridors that enable drivers from nearby states to visit national and state parks. ChargePoint encourages WYDOT to allow applicants to apply for single sites along a designated corridor or route instead of requiring complete corridor applications. Taking this approach will increase competition and enhance local economic development.

h) What is the best way to address off corridor or route communities?

WYDOT could address these specific communities in addition to the routes or corridors where you would like to see DCFC, or focus on corridors first with a subsequent funding round focused on bringing DCFC to off corridor/route communities.

i) The National Institute of Standards and Technology (NIST) publishes Handbook 44, Specifications, Tolerances, and Other Technical Requirements for Weighing and Measuring Devices. Currently, Section 3.40, Electric Vehicle Fueling Systems – Tentative Code, has not been fully approved by the National Conference on Weights and Measures and is not enforceable.

1. What is your familiarity with the development of the tentative code?

ChargePoint is familiar with Handbook 44 and supports its adoption as a critical consumer protection at both a state and federal level. ChargePoint also supports HB 44 as an eligibility requirement for state and federal funding opportunities. While NIST and state officials are still developing field testing criteria for DCFC units, manufacturers can be required to provide independent laboratory test documentation on DCFC models.

2. Are you manufacturing or installing charging equipment that complies with the current version of the tentative code?



Yes, ChargePoint's Level 2 and DCFC stations currently comply Handbook 44 and our publicly accessible Level 2 charging stations have earned the California DMS certification. [See here for more information.](#)

3. Do you anticipate any difficulty supplying charging equipment that will meet the requirements of the National Type Evaluation Program administered by NCWM?

No.

j) In what ways can we posture aviation infrastructure to be ready for the integration of zero emissions aircraft?

We have no comments on this.

2. Utilities

a) What utility access and capability considerations should be present (power, broadband, wireless, cellular, other)?

Utility coordination will be critical to ensuring a site has access to 480 Volt 3 phase power. To the extent that utilities can provide additional support to cover any line extension and make ready costs, it can help to defray a significant portion of project costs, and ensure that grant funding can cover a meaningful portion of the DCFC hardware, software and extended warranty.

b) How should demand charges be addressed?

Demand charges should be addressed by engaging the WY Public Service Commission as well as municipal and cooperative utility governing bodies ChargePoint supports utility rates that recover the cost of service primarily through volumetric rates, rather than demand charge for low load factor applications such as DCFC installations.

c) What utility incentives aid in infrastructure development?

Make ready incentives that can cover both utility and customer side make ready infrastructure, including any needed upgrades to the utility distribution network, transformers, meters, and panels all the way up to but not including the DCFC equipment. Incentives that can cover any line extensions to bring power to the site are also critically important to support infrastructure development.

3. Statutory and Policy Considerations

a) What current Wyoming statutes hinder infrastructure development? How should they be changed?



As we have seen the growth of electric vehicles across the country, a question that has arisen in other states is “are electric vehicle charging stations delivering power and therefore a public utility?” Wyoming is not unique in needing to update state statutes to provide specific guidance on how electric vehicle charging stations should be treated by utility regulators. 39 states and the District of Columbia have looked at this issue and come to the same conclusion that electric vehicle charging stations are providing a service, not power, and therefore should not be considered a public utility. This clarification is a critical step in setting up a robust, competitive marketplace for electric vehicle charging services.

b) What state agency rules and regulations hinder infrastructure development? How should they be changed?

As stated above, ChargePoint would support the state adopting NIST Handbook 44 Section 3.40, which provides critical consumer protections.

c) What incentives should the state implement to encourage infrastructure development? What has worked best in other states?

Grants that can provide up to 80% reimbursement of eligible costs for publicly accessible DCFC on private property, and up to 100% reimbursement of eligible costs for publicly accessible DCFC on public property. Eligible costs should include all costs related to design, engineering, permitting, construction and project management, and all costs related to DCFC hardware, 5 years of networking and a 5 year extended warranty.

d) Should the use of state lands be considered for infrastructure emplacement? Why or why not?

We think that publicly accessible DCFC on public property should be considered for infrastructure emplacement, so long as those properties can provide the amenities and services outlined in ChargePoint’s response to Question 1a above.

e) What should be considered as “fair” road system maintenance taxation rates for zero emissions vehicles?

At this stage of EV adoption in Wyoming, ChargePoint believes that the \$200 annual fee established by HB 0166 (2019) is more than sufficient to recover the necessary road system maintenance cost from EV drivers. While the state may look to other mechanisms in the future, at this state of EV adoption in Wyoming, the flat, annual fee is an administratively efficient means of revenue collection.

f) What are additional considerations for commercial vehicles?

While the focus should be on infrastructure that support light duty vehicles, commercial vehicles whether light, medium, or heavy-duty can all utilize publicly accessible DCFC.

4. Incentives

a) Should corridor and local travel infrastructure incentives be handled differently? If so, how?

b) What type and amount of financial incentives work best to encourage infrastructure installation?

Grants that can provide up to 80% reimbursement of eligible costs for publicly accessible DCFC on private property, and up to 100% reimbursement of eligible costs for publicly accessible DCFC on public property. Eligible costs should include all costs related to design, engineering, permitting, construction and project management, and all costs related to DCFC hardware, 5 years of networking and a 5 year extended warranty.

c) Other than government financial assistance, what other incentives may be helpful?

Utility rates that account for the low load factors of EV charging and utility make ready incentives to reduce capital investment and ongoing operational expenses.

d) If the strategy is route or corridor based, what is the best way to incentivize infrastructure installation in off-corridor communities?

A similar program type and structure should be able to incentivize infrastructure installation in off-corridor communities. Similar to identifying the routes or corridors, WYDOT should identify the communities in which it seeks to have infrastructure installed.

SECTION 2 SPECIAL PROVISIONS

1. OWNER

- 1.1. All supporting documentation and manuals submitted with this RFI will become property of the State unless requested otherwise by the respondent at the time of submission.
- 1.2. All information provided will be made available to all members of the evaluation team and others as needed. Use of proprietary information is discouraged.

2. WYOMING DEPARTMENT OF TRANSPORTATION CONTACT

Cori Schrinar
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cori.schrinar@wyo.gov

3. QUESTIONS

3.1 Written questions regarding RFI material shall be submitted into Public Purchase. **Questions will be received in writing until 11:00 A.M. MT, November 4, 2021.** No telephone call or E-Mail questions will be accepted.

4. PREPARATION COST

4.1. Costs of developing the information package are entirely the responsibility of the respondent and shall not be reimbursed in any manner by the Wyoming Department of Transportation. The Wyoming Department of Transportation is not liable for any cost incurred by the respondent.

5. REFERENCES

5.1. Respondents may provide reference material if it is needed to support the information package. References should reflect similar government projects.

6. AUTHORIZATION

By submission of information, the respondent:

Certifies that no attempt has been made, nor will be made, by the respondent to induce any other person or firm to submit information for the purpose of restricting competition.

Certifies the person signing this response is authorized to represent the company and the information and supporting documentation provided in response to this RFI.

_____ CharePoint _____ (Company Name)	_____ 203-313-3408 _____ (Telephone Number)
_____ 254 East Hacienda Ave _____ (Street Address/P.O. Box)	_____ Campbell, CA 95008 _____ (City, State & Zip Code)
_____ (Name of Authorized Rep.) _____	_____ (Authorized Signature) John Schott
_____ John Schott _____ _____ 12/1/2021 _____ (Date)	_____ john.schott@chargepoint.com _____ (E-Mail Address)