March 16, 2019

New Hampshire Office of Strategic Initiatives
Johnson Hall, 3rd Floor
107 Pleasant Street
Concord, New Hampshire, 03301

RE: Direct Current Fast Charging Infrastructure - Request for Information - Volkswagen Mitigation Program

EVgo appreciates the opportunity to provide written comments in response to the Request for Information as the New Hampshire Office of Strategic Initiatives (OSI) revisits its Volkswagen Light-Duty Electric Vehicle Supply Equipment (EVSE) program.

EVgo commends New Hampshire for taking important steps in electrifying transportation by prioritizing electrification in its Beneficiary Mitigation Plan and utilizing the full 15% allocation permitted by the national settlement towards Light-Duty ZEV Supply Equipment, or approximately $4.6 million in New Hampshire. EVgo also commends OSI for reconsidering program and Request for Proposal (RFP) design following the lack of participation in the previous RFP in late 2019 and looks forward to further engagement with OSI staff.

For context, EVgo operates America’s largest electric vehicle (EV) public fast charging network, with 800 DC fast charging (DCFC) locations across 34 states, including a small but growing footprint in New Hampshire. Currently, more than 115 million Americans live within a 15-minute drive of an EVgo fast charger. In 2019, EVgo was proud to announce that it was the first North American charging network to be powered by 100% renewable energy. EVgo looks forward to accelerating its deployments in New Hampshire in partnership with state’s revised programs.

With the perspective of an experienced owner and operator of public fast charging, EVgo respectfully submits the following select recommendations to OSI as it develops its upcoming light duty Appendix D EVSE programs:

1. **Focus charging infrastructure first in urban areas with high multi-family dwelling density to alleviate barriers to EV adoption.**

   Urban areas with high density of multi-family dwellings often go without access to home charging. In a report quantifying the gap in needed charging infrastructure to support EV adoption, the International Council on Clean Transportation (ICCT) places the number of apartment-dwellers who rely on public charging as high as 82%1.

   Focusing on urban charging infrastructure, specifically DCFC with the ability to recharge a higher number of vehicles, would be consistent with OSI’s state goal of “[supporting] the use of electric vehicles” and give “priority to projects that are located in economically challenged communities, areas with historical air quality issues, and areas that receive a disproportionate quantity of air pollution from diesel fleets.”2

   Moreover, in urban cores, publicly accessible charging stations help alleviate the barrier of owning an electric vehicle when home charging is not an option. This ensures that multifamily communities and renters – not just homeowners with garages – are able to take advantage of the benefits of an EV.

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2. **Establish 50kW as the minimum for DC fast charging infrastructure, with “future proofing” as an eligible expense.**

A 50kW **minimum** power rating for DCFC is consistent with other programs across the country, including New York, Washington, North Carolina, California, Virginia, and other states. It cannot be emphasized enough that DCFC is not purely a corridor technology, but also one of urban lifestyle charging in many cases. This creates an important role for the 50kW charger, which delivers real fast charging capability (at approximately 3 miles driving range per minute of charge) with low capital requirements and significantly streamlined siting and approval due to lower power requirements than higher power charging. EVgo currently deploys 50kW, 100kW, 150kW and installed the first 350kW charger in the country in Baker, CA. Matching throughput to application is a strong principle for successful charger deployments, and the average dwell time for retail locations – some of the most popular locations for DCFC - is approximately 30 minutes, making 50kW and 100kW chargers strong candidates for maximizing effective deployment.

By establishing 50kW as the minimum power rating, OSI allows program partners to optimize the value of the settlement funding while delivering at charge rates that vehicles on the road can handle today.

However, if an applicant requests higher power charging, OSI may consider a higher grant allocation for higher power charging, which will have higher costs. Additionally, EVgo also recommends that **“future proofing”** be made an eligible expense; this will allow for sites to be “upgraded” to higher power as vehicle battery and charging capabilities develop.

3. **Clarify funding allotments for DC fast charging (DCFC) and Level 2.**

As stated in the New Hampshire’s original RFP, OSI had been providing funding for DCFC and Level 2, without a clarification on how the funding will be divided, if at all. The significantly higher costs of DCFC stations - which is warranted by the much larger number of vehicles that each DCFC serves – should be taken into strong consideration. This would be consistent with other states’ approaches to Appendix D, including New Jersey’s decision to dedicate $7 million of its Volkswagen diesel emissions settlement funds to fast-charging infrastructure technology³, and North Carolina, who similarly devoted $3.45 million of its first funding window to fast charging.⁴

Fast charging infrastructure is critical to reaching the state’s increasing population of EV drivers and is especially crucial to enabling electrification for drivers without reliable access to charging at home or in the workplace, residents of multi-unit dwellings who rely on public charging for the majority of their charging needs⁵, drivers utilizing key transit corridors, as well as light duty vehicle (LDV) fleets, including car and rideshare applications. To ensure the share of each technology aligns with environmental goals, OSI should clarify the amount of funding that will be reserved for each technology, with a strong emphasis on robust investments in DCFC.

4. **Keep funding application windows continuous to accommodate a dynamic market.**

As opposed to allocating all funding at once, EVgo recommends that OSI continuously open funding windows in order to ensure constant development in the state and avoid any disruptions in the market. Pennsylvania and New Jersey are two states taking such an approach.⁶,⁷

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⁴ https://deq.nc.gov/about/divisions/air-quality/motor-vehicles-and-air-quality/volkswagen-settlement/vw-settlement-0
⁶ http://www.depgis.state.pa.us/DrivingPAForward/
⁷ https://www.drivegreen.nj.gov/plugin.html
It may even be advisable to “backload” funding into the future, with a significant but minority portion of funding allocated in the first year, with total budgets growing as EV penetration enables a smaller capital subsidy to be awarded as utilization expectations pick up more of a given project’s financials.

5. **Develop balanced, quantifiable scoring criteria to score proposals.**

OSI should develop scoring criteria that sends a signal to the market about which projects the state would like to see to meet its policy goals, and the relative balance between what can be competing priorities. EVgo has found that complete geographic coverage, for example, often comes at the funding expense of high utilization and environmental impact, and in turn, less-used chargers require higher subsidy.

The “gold standard” for balancing state-specific needs with practicalities of EV charging has to date been North Carolina, which developed a balanced rubric to assess applications, and uses transparent, third-party measures such as driving range to extant DCFC, and measures of environmental justice impact to assess what could otherwise be difficult criteria to develop towards. EVgo highly recommends that OSI review the North Carolina Request for Proposal (RFP) as a best practice.

6. **Value, but do not specify, charging station locations in program RFP.**

While there are important considerations for OSI to make in regard to charging equipment and charger use cases, EVgo recommends flexibility in the RFP guidelines for site locations of proposed charging stations. The private sector is well-equipped to carry out site selection and development, and in many cases has national host relationships that can be used to deploy at scale and meet the state’s public policy criteria.

In a similar vein, the outright requirement for locations with 24/7 access without a pay gate may make the already-limited viable potential site locations (e.g. power capacity requirements) unviable due to binary program requirements. In these off cases, preferential scoring for gate-less sites is a more balanced approach, and specific applications should be able to recognize unique geographic needs and parameters.

Additionally, if New Hampshire continues investment prioritization along its state corridors, EVgo recommends that OSI employ a definition for corridors that meets the state’s need while also maintaining flexibility with respect to distance from highway in order to optimize public value and usage by EV drivers. EVgo echoes North Carolina’s Request for Proposal approach to scoring applications for proximity to key chosen corridors. For example, scoring out of 100, they provide 15 points for proposed sites within 2 miles of the interchange, 10 points for sites within 2 to 3 miles, and 5 points for sites within 3 to 5 miles, and no points for sites beyond 5 miles, effectively prioritizing proximity to the highway while leaving room to account for the complexities of site selection.

7. **A letter of intent signed by a host customer should be considered sufficient for project applications.**

While EVgo does not advocate for funding programs that do not require developers to first identify a specific location for their equipment, a letter of intent should be sufficient to demonstrate site control in the case that the grant applicant is not also the site host.

Such a letter demonstrates site control while allowing all parties to execute additional contractual requirements after, not before, funding has been secured. EVgo has found that this is often preferred.

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for site hosts, and a similar approach by New Hampshire will ensure that certain sites are not excluded due to additional onerous paperwork requirements signed before funding is certain.

**Conclusion**

EVgo thanks the Office of Strategic Initiatives for the opportunity to provide input and commends the extensive work in moving transportation electrification forward in New Hampshire. As OSI continues to revisit its Light-Duty EVSE program, please consider EVgo as a resource. We offer ourselves as a continuing partner to usher in a new era of transportation innovation in New Hampshire.

Sincerely,

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