

**DOCKETED**

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**Xeal Energy Comments on 2025â€“2026 Investment Plan for the  
Clean Transportation Program**

See attached letter.

*Additional submitted attachment is included below.*



November 7, 2025

California Energy Commission  
Docket No. 25-ALT-01  
715 P Street  
Sacramento, CA 95814

RE: Docket No. 25-ALT-01 - 2025-2026 Investment Plan Update for the Clean Transportation

Dear California Energy Commissioners and Staff,

Xeal Energy (Xeal) appreciates the opportunity to provide feedback on the 2025-26 Investment Plan Update for the Clean Transportation Plan and would like to thank staff for their continued work and leadership in supporting EV charging infrastructure deployment in California.

Xeal has developed the next generation of EV chargers to help address the issue of reliability. Xeal was founded by a group of individuals who were also frustrated with no-charge events and sought solutions to this problem. Xeal's charging infrastructure does not rely on a central point of internet connectivity, which causes most of the charging reliability issues today. Instead, users are provided unique and encrypted tokens that authorize, activate, and transact charging sessions without internet service directly between the charger and phone. All the smart computing is done onsite and during this interaction. This means chargers can operate anywhere – including parking garages and communities with limited internet connection and enable a near 100% uptime and frictionless user experience.

Primarily focused on supporting multifamily housing and commercial real estate owners and operators, our partners manage these smart EV charging stations remotely through Xeal's dashboard, providing real-time data on charging sessions, energy management, utilization, and revenue share. Our driver app employs token-based technology for EV drivers to gain reliable access to charging stations without relying on cellular or garage IT infrastructure. Our chargers require zero connection to the backend, therefore there is no "loss of connectivity" because it is always present between the driver's phone and the charger through our secure, short-range communication protocol.

The two main hurdles to EV adoption are convenient access to EV chargers, which is lacking at many multi-family sites, and the reliability of those chargers. According to a 2022 survey by JD Power, 27% of EV buyers who own their home say they are "very likely to consider" an EV, versus only 17% of those who rent. Additionally, 34% of those who indicate they are unlikely to consider purchasing an EV say they lack access to any charging capabilities at home or work. A report by EVAdoption titled 'The State of EV Charging in Apartment Communities' found nearly half of apartment dwellers lack access to "home" charging versus only 5% of single-family homeowners. Further, according to the Air Resources Board, upward of 85% of EV charging is estimated to occur at home. As a result, supporting the deployment of EV infrastructure at multifamily housing will be crucial to achieving the state's goals.

To that end, Xeal appreciates the Commission's work in developing funding allocations under the *2025-2026 Investment Plan Update*. In particular, we support the proposed allocation of \$98.5M in FY 25-26 for Light-Duty Charging Infrastructure. Within this funding, we support staff's prioritization

of focus on “level 2 charging in locations with longer vehicle dwell times, including at-home charging with specific focus on multifamily residences.” Specifically, we strongly support an additional round of the Reliable, Equitable, and Accessible Charging for Multi-family Housing (REACH) program, as well as additional investments in the Communities in Charge program.

The Senate Bill 1000 analysis shows that not having access to charging at home is one of the most significant barriers to EV adoption. Continued Clean Transportation Program support for EV infrastructure at multi-family residences will be crucial to overcoming the access to charging barrier, accelerating ZEV adoption, and ensuring equity.

Xeal appreciates the opportunity to support and provide input on CEC’s development of their Clean Transportation Investment Plan, and we look forward to continuing to work with the CEC and other stakeholders to support the deployment, access, and reliability of light-duty charging infrastructure.

Sincerely,

*Michael A. Smith*

Michael A. Smith

Vice President

[Mike.Smith@xealenergy.com](mailto:Mike.Smith@xealenergy.com)