

DOCKETED

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SWTCH comments on EPIC 5 Investment Plan

Additional submitted attachment is included below.

June 18, 2026

California Energy Commission
715 P Street
Sacramento, CA 95814

Submitted electronically at energy.ca.gov

Re: Docket No. 25-EPIC-01

Dear Energy Commission:

SWTCH respectfully submits these comments to inform the Energy Commission's Electric Program Investment Charge 2026-2030 (EPIC 5) Investment Plan.

About SWTCH

With more than 25,000 chargers deployed, SWTCH is a leading provider of electric vehicle (EV) charging and energy management solutions for multifamily, commercial, and workplace properties across California and North America. SWTCH's end-to-end solution optimizes EV charging usage and manages load to benefit drivers, property owners, and the grid. SWTCH's charging management system (CMS) is built on a foundation of open communication standards and interoperability to ensure future flexibility, scalability, and innovation.

Comments

SWTCH appreciates the Energy Commission's stakeholder-informed process for shaping the priorities for the current and prior cycles of EPIC investment plans. SWTCH especially commends the Commission for its recent standardization of data reporting. This standardization will both streamline data reporting by charging providers and enable more useful analysis of the data, not only in California but in other jurisdictions that follow California's lead.

For the EPIC 5 Investment Plan, SWTCH offers the following recommendations:

- *Maintain Transportation Electrification as a strategic goal, including the objective to scale managed charging as a grid resource.*¹

California has made bold commitments to decarbonize the transportation sector via electrification. Although California is a national leader, the State

¹ EPIC 5 Public Workshop Presentation ADA Compliant, at slide 14

continues to require focused and thoughtful support to have a fighting chance at achieving its goals. The changing national landscape, including the termination of the 30D EV tax credit and the 30C EV infrastructure credit, are contributing to broader market headwinds that are slowing adoption. It is appropriate and warranted to continue to prioritize transportation electrification via EPIC funding.

- Prioritize projects that address the multifamily customer segment.

Multifamily households remain significantly underserved in California when it comes to charging access and EV adoption. It is appropriate that Commission staff identified multifamily as one of the commercial customer segments for which the Commission hopes to boost managed charging participation via EPIC 5 funding.²

- Support deployment solutions for the multifamily sector.

To boost managed charging participation, it's worth noting the obvious, that managed charging requires a driver to be able to charge in the first place. Compared to single-family housing, the multifamily sector is uniquely complicated and challenging when it comes to deployment of charging infrastructure. Reasons vary from one property to another, and can include: the need for more infrastructure which drives up both cost and complexity; power and energy constraints; multiple layers of decision makers; and for rental apartments, a dynamic in which the EV drivers and potential EV drivers who want the chargers and often bear the expense of installation (the tenants) do not own the property.

For these reasons, multifamily deployment in and of itself – separate and apart from managed charging – is a worthy objective and merits consideration for EPIC funding.

- Continue to fund innovation in the built-environment: multifamily, high-density housing (apartments, townhomes) with an emphasis on equity.

EV charging solutions at multifamily and other high-density properties not only support the Transportation Electrification strategic goal; they also support the complementary strategic goals of Building Decarbonization and DER Integration. In keeping with this holistic theme, some concepts worth considering for EPIC 5 funding opportunities include the following:

² EPIC 5 Investment Plan Public Workshop. June 11, 2026.

- Seamless integrations that enable property managers to handle heating, cooling, and transportation electrification needs with one solution.
- Solutions that bridge legacy and new equipment, so that rip-and-replace is not the only option, but integration and upgrade is a viable approach too.
- Solutions that prioritize reliability of communication and operational simplicity alongside technical sophistication.
- Grid-aware technology that supports vehicle-grid integration (VGI) initiatives.
- Visibility for utilities that enable active management capability that delivers measurable value to the grid from the bulk power system to the local distribution level.

From a technology perspective, these concepts can be summarized as follows:

- Control and monitoring solutions integrated with existing and new electrical systems.
 - IoT-enabled, coordinated device ecosystems that communicate with each other to optimize whole-building electricity usage while coordinating with utilities to align demand response, grid flexibility, and VGI initiatives.
 - Support Open Standard Protocols ISO15118-20, OpenADR 3.0, and IEEE2030.
- When establishing eligibility requirements for CEC-funded infrastructure, allow flexibility and alternative compliance pathways for Energy Star.

As a steward of public dollars, the Energy Commission rightfully establishes eligibility standards for the infrastructure it funds. The CEC's Communities In Charge program (funded through the Commission's Clean Transportation Program rather than through EPIC) appropriately requires hardware and software to meet a wide range of technical specifications.³ These specs ensure that any CIC-funded chargers will adhere to uniform standards for interoperability, network connectivity, and more.

³ Communities In Charge. "Technology Eligibility."
<https://thecommunitiesincharge.org/technology-eligibility/>. (Accessed June 18, 2026.)

One of the eligibility requirements for EVSE equipment is to “Be Energy Star certified.”⁴ Unfortunately, in part due to changes in how the U.S. Environmental Protection Agency (EPA) has administered the Energy Star program under the current federal Administration, this requirement is excluding SWTCH and perhaps other technology providers from being eligible for the funding.

For context, SWTCH develops its charging management system (CMS) in-house, and procures chargers from several different manufacturers. SWTCH then sells and deploys these networked chargers that operate on SWTCH’s CMS.

SWTCH’s CMS meets the network specifications for Communities in Charge, and hardware SWTCH carries meets the equipment specifications, *including Energy Star*. As a result, SWTCH is listed as an eligible network provider for Communities in Charge,⁵ and hardware SWTCH carries is listed as eligible equipment for Communities in Charge.⁶

Despite meeting the required specifications for both the charging network and the equipment, SWTCH remains ineligible for Communities in Charge. This is due to the way in which the EPA certifies chargers. Even though several of the makes and models of chargers that SWTCH carries have received Energy Star certification, the certification ties the specific hardware model to a specific CMS. For another network provider to receive Energy Star certification for the same model of hardware, it needs to be separately submitted and certified by the EPA under the separate CMS.

This process of requiring separate Energy Star certification for the same, already-certified hardware model for every new CMS is exceedingly costly and time consuming for network providers, and arguably creates inefficient barriers to entry that are counterproductive for the market.

SWTCH had been engaged in productive dialogue with EPA about its certification approach and ways to streamline it to address these concerns. On January 15, 2025, the EPA published the draft of a new Energy Star

⁴ Ibid.

⁵ Communities In Charge. “Participating Network Providers.” Updated August 2025. <https://thecommunitiesincharge.org/wp-content/uploads/2026/01/Participating-Network-Providers-1.15.26-1.pdf>.

⁶ Communities In Charge. “Eligible Equipment Catalog.” Updated April 2026. <https://thecommunitiesincharge.org/wp-content/uploads/2026/06/Eligible-Equipment-Catalog-04.16.26.pdf>.

Version 2.0 Specification.⁷ Public comments on the draft Version 2.0 were to be due that February, and SWTCH was anticipating further iterations of the new specification.

On January 20, 2025, the current federal administration took office. The following week, the EPA then canceled a public stakeholder webinar about the draft Version 2.0 specification that had been scheduled for January 30, 2025. The EPA has not posted any further updates since then. As a result, the current EnergyStar specification remains Version 1.2, published in June 2023.⁸

This Energy Star requirement which excludes SWTCH and possibly other vendors from CIC eligibility is problematic for SWTCH, to be sure, but it also works against the CEC's own interests in getting a wide range of applicants to apply for its funding programs. The reason for this is that technology providers are often the ones who are aware of funding opportunities and who take the initiative to do outreach and education to potential applicants. When technology providers are excluded from funding opportunities due to a restrictive loophole such as this Energy Star requirement, the CEC then loses the benefit of that provider spreading the word about the funding and the additional diversity of applications that would result.

There are many good reasons for requiring third-party certifications from organizations that are outside of a funder's control. However, there are also risks associated with it, as this Energy Star situation illustrates. In addition to the risk of excluding vendor participation, another consequence is the lack of an updated Energy Star Version 2.0 specification. As a result, all eligible equipment for CIC funding remains based upon a 2023-vintage energy efficiency specification.

Fortunately, there are other approaches available to the CEC, not only for Communities in Charge, but also for EPIC and other funding streams. Two suggested approaches are:

⁷ EPA Energy Star. Electric Vehicle Supply Equipment Version 2. https://www.energystar.gov/products/ev_chargers/evse-partners/electric-vehicle-supply-equipment-version-2. (Accessed June 18, 2026.)

⁸ EPA Energy Star. Electric Vehicle Supply Equipment Version 1. https://www.energystar.gov/products/spec/electric_vehicle_supply_equipment_pd. (Accessed June 18, 2026.)

- To continue to require Energy Star-certified hardware, but to allow the hardware to be eligible when it is operated by a different approved Participating Network Provider than the one tied to the Energy Star certificate.
- As an alternative to Energy Star, to allow equipment to be eligible that is approved by a credible, third party qualified equipment list such as those developed by EPRI or EVCAN.

EPRI, as a notable example, is a research institution that describes its Vetted Product List (VPL) as “the nation's most comprehensive and consolidated resource for industry stakeholders, to include utilities *and state agencies*, to vet products and equipment for the deployment of electric vehicle charging and hardware systems.”⁹ (Emphasis added in italics.)

The Energy Commission’s EPIC funding opportunities remain critically important for California to continue to lead in making electrification more affordable, efficient, and effective. SWTCH appreciates the Commissioners and staff’s thoughtful and collaborative approach in shaping this next investment round.

Please reach out if I can answer questions or provide more information.

Sincerely,



Josh Cohen
VP, Policy

⁹ EPRI. Vetted Product List. <https://www.epri.com/vpl>. (Accessed June 18, 2026.)