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Greenlots Comments on Title 20 CEC Rulemaking

Additional submitted attachment is included below.

October 17, 2016

California Energy Commission
Docket #: 16-OIR-01
1516 9th Street
Sacramento, CA 95814

Subject: **In re: General Rulemaking Proceeding for Developing Regulations, Guidelines and Policies for Implementing SB 350 and AB 802: Title 20 Data Collection Regulations to Support New Analytical Needs**

Greenlots appreciates the opportunity to comment on the California Energy Commission's (CEC's) Title 20 Data Collection Regulations to Support New Analytical Needs, specifically subdivision (g) Hourly Load for Electric Vehicle Supply Equipment.

Greenlots is a leading provider of grid-focused electric vehicle charging software and services. The Greenlots' network supports a significant percentage of the DC fast charging infrastructure in North America. Greenlots' smart charging solutions are built around an open standards based focus on future proofing while helping site hosts, utilities, and grid operators manage dynamic EV charging loads

We understand and appreciate the necessity for the CEC to use data to support the implementation of SB 350 (De León) [Chapter 547, Statutes of 2015], AB 802 (Williams) [Chapter 590, Statutes of 2015], and to achieve improved energy analytics for California. Greenlots and its utility clients would like to work with you to ensure that any data the CEC is seeking to collect is legally permissible, technically feasible, and will effectively achieve improved and useful energy analytics.

We appreciate the opportunity to provide the following comments:

Given that charging-station data is already being collected in multiple forums, we recommend that the Demand Forecasting, Fuels and Transportation, and Electric Program Investment Charge divisions at the CEC first convene and lead an electric-vehicle-data working group to bring together data experts in order to compare and understand the data, and determine what gaps need to be addressed. The working group could use data from, for example: The National Renewable Energy Laboratory Alternative Fuels Data Center database, CEC Alternative and Renewable Fuel and Vehicle Technology Program grant reporting, California Air Resources Board grant reporting and Low Carbon Fuels Standard reporting, and data of the sort that companies like ours already provide to research institutions. In addition, the Low Carbon Fuel Standard program is undergoing changes that will likely result in reporting of additional charging station data in 2018, and utilities are required to post in 2017 the available capacity of all distribution circuits, which will make placing charging stations easier. Appropriate data experts to include in such a working group would include those from national labs, universities, utilities, research organizations like the Electric Power Research Institute, and other

appropriate state agencies like the California Air Resources Board and the California Public Utilities Commission.

We believe that a voluntary program would yield enough data to inform demand forecasting and result in improved energy analytics, on top of the data currently available. A voluntary approach would allow for those charging-station owners and operators that have adequate resources and capabilities to supply data, but would not overly burden owners and operators that do not have the resources or capabilities to supply the kind of data required in the proposed regulations. Such an approach, which would yield useful representative data samplings, could be developed through a working group like the one described above.

Should the CEC move forward with these regulations, we encourage the CEC to ensure that the regulations are straightforward, simple, do not cause confusion in the marketplace, or slow the progress of the plug-in electric vehicle market. Imposing financial penalties on charging station owners

and operators for not complying with the reporting requirements will likely deter many businesses from deploying charging infrastructure in the first place.

We encourage the CEC to also recognize what sources of data utilities have ready access to and those sources that are not currently under utility purview. For example, today, utilities do not know when a customer purchases an electric vehicle or installs a home charger unless that customer self identifies through participation in a particular electric-vehicle rate or another program. We are also concerned about the level of data required for all charging stations, even level 1, and the feasibility of obtaining this data. Many utilities that currently own charging stations do not collect hourly consumption data and could not supply individual, hourly charging-station data on a daily basis for hundreds or thousands of charging stations.

There are complexities around how a charging station is metered and networked (if it is networked[1]), and it may not be possible for utilities to provide all of the data in subdivision (g)(4) on the time scale in (g)(3). Requiring "networked electric vehicle charging station status, operational, and billing information [to] be provided to the Energy Commission as frequently as is possible for the electric vehicle station equipment or at least daily" in (g)(3), combined with the requirements of (g)(4) for "each charging session" is analogous to a report on every single gasoline fill-up that occurs in the state as soon as the transaction is completed. This level of reporting seems impractical. Greenlots and its

[1] Although the regulations recognize that there are both networked and non-networked charging stations, we caution the CEC against moving toward any approach that would require charging stations to be networked. Requiring charging stations to be networked results in increased costs, which makes it harder for many locations to install charging stations and hurts the adoption of electric vehicles.

utility clients would be happy to work with you to determine what level of data is practical and feasible to collect and report.

Due to the expansive nature of the regulations—i.e., that all owners or operators of charging stations of all power levels would be required to provide data—they appear to be infeasible and impractical as presently worded. For example, as currently worded, a homeowner that charges their electric vehicle using a level 1 charger provided by the manufacturer of the vehicle, could be deemed an owner of an electric vehicle charging station under these regulations and would have to supply all of the data in subdivisions (g)(1) and (2) to the CEC. The regulations would likewise apply to small businesses, multiunit dwellings, and workplaces that chose to install and own charging infrastructure for their residents/employees. These locations may also choose to save money by using metering or demand response for the entire circuit or by using simple monthly billing systems; which could make it infeasible for them to report this level of data. Putting additional requirements on owners or providers of charging stations at these locations could result in increased cost and market stagnation at a time when California must cultivate the market to get more plug-in electric vehicles on the road and achieve its policy goals. We assume this is not the intention of the regulations.

We will be pleased to work with you to determine what data is already available, and how best to gather the kind of data that is not available, to support the CEC's implementation of SB 350, AB 802, and to achieve improved energy analytics.

Thank you for your consideration of these comments.

Respectfully submitted,

Thomas Ashley
Senior Director, Government Affairs & Public Policy
Greenlots