

DOCKETED

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Project Title:	Block Grant for Electric Vehicle Charger Incentive Projects
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Exempt Energy Star Requirement for Green Energy/Off-Grid Charging Stations under all California incentive programs

Additional submitted attachment is included below.



March 29, 2018

California Energy Commission
Docket Office, MS-4
Docket No. 17-EVI-01
1516 Ninth Street
Sacramento, CA 95814

RE: Block Grant for Electric Vehicle Charging Incentive Project

Dear Commissioner Janea A. Scott and CEC Staff:

Paired Power, Inc. is grateful for this opportunity to provide feedback on the California Energy Commissions (CEC) CALeVIP rebate program being administered by the Center for Sustainable Energy (CSE) and for the CEC for taking these comments into consideration.

Paired Power supports the available rebate structure of \$4,000 for a single port and \$7,000 for a dual port station as supportive to expand electric vehicle (EV) infrastructure throughout California. Our team also appreciates the efforts to streamline funding for EV charging infrastructure projects through the on-line application process developed by CSE. While Paired Power recognizes the benefit this program will provide to EV drivers and site hosts, we have concerns regarding keeping ENERGY STAR certified EV chargers as a requirement in the program.

As a 100% solar EV charging technology leader, we at Paired Power, Inc. encourage the Energy Commission ***NOT*** to inadvertently lock out smart new EV charging solutions by narrowly requiring ENERGY STAR certification for EV charging infrastructure in RFP's, incentives, and programs.

Granted, we accept the instances when grid-connected, AC-powered, standalone EV charging stations should have ENERGY STAR certification. But ENERGY STAR does not apply to newer EV charging technologies and topologies that do not use the energy grid to power electric vehicles.

First, there is no ENERGY STAR standard developed for microgrid, off-grid, solar-powered, or direct current (DC) powered EV charging solutions. For example, our efficient Paired Power SEVO SunStation™ directly charges from sun-to-EV, DC-to-DC with shared electronics serving

up to six parked electric vehicles at a time. Not only is there no applicable ENERGY STAR standard, the efficient & shared electronics save energy and are powered 100% by solar energy (not the grid) that's not covered by ENERGY STAR program. Our EV charging solution is inherently the most energy efficient EV charging scenario possible (since it uses no grid, fossil, or nuclear power), and requiring ENERGY STAR certification doesn't make sense in this innovative scenario.

Second, the ENERGY STAR program is not responsive to speedy application processing, and currently only supports an AC-grid-connected standard. This standard prevents new innovative solutions like ours from the market if ENERGY STAR certification is required on a blanket basis for all EV infrastructure programs and bids.

Our recommendation is to either abandon ENERGY STAR certification requirements for all EV charging infrastructure for the next few years ***or*** to require it **ONLY** for AC connected EV chargers but not for off-grid renewable energy DC chargers. This would allow alternative DC, off-grid, and renewable energy-charged systems for workplaces and other community site locations to be included in future CALeVIP incentives, RFP's and programs without imposing a blanket restriction to meet the ENERGY STAR requirement. In the instance of 100% solar EV charger microgrid might be connected to the energy grid in the future, we recommend a 1-2 year grace period or exemption due to lack of standards developed under the ENERGY STAR program for these types of innovative technologies.

Our team would be happy to answer questions or brainstorm guidelines that embrace the spirit of the ENERGY STAR program without impeding innovation for EV charging infrastructure projects. We hope you'll adjust requirements in California to reflect these more **inclusive guidelines** that will benefit EV drivers across all sunny geographies.

Sincerely,



Tom McCalmont

CEO

Paired Power, Inc.