

DOCKETED

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Comment Received From: Tom McCalmont
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Paired Power Comments for CALeVIP Incentive Program Requirements

Additional submitted attachment is included below.



July 3, 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

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

In response to the California Electric Vehicle Infrastructure Project Future Equipment Requirements Webinar presented on June 28, 2018, Paired Power supports the available incentive structure of \$4,000 for a single port and \$7,000 for a dual port station as enabling to expand electric vehicle (EV) infrastructure throughout California. While Paired Power recognizes the benefit this program will provide to EV drivers and site hosts, we wish to reiterate our concerns with several requirements of the CALeVIP incentive program –

ENERGY STAR Requirement

As a 100% solar EV charging technology leader, our recommendation is to require ENERGY STAR Certification only for AC connected Level 2 EV chargers. However, we request that innovative off-grid, mobile, and renewable energy DC chargers regardless of charge rate (Level 1, 2, 3) are exempt from these requirements under the CALeVIP program. This exemption 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. Also, noted in the ENERGY STAR Program Requirements document¹ that DC Output EVSE isn't eligible for ENERGY STAR certification. Thereby, we implore that CEC and CSE exempt off-grid, mobile, and renewable energy DC chargers regardless of charge rate (Level 1, 2, 3) to allow these types of charging stations to be included in the CALeVIP incentive program.

¹ ENERGY STAR Program Requirements for Electric Vehicle Supply Equipment – Eligibility Criteria (Rev. Apr-2017), Sec. 2.2.; Subsection 2.2.2; pg. 6.

Open Charge Point Interface Requirement

Paired Power supports the adoption and future requirement of Open Charge Point Interface (OCPI) for expanding interoperability between EV's and charging stations. We also support the recommendation of potential funding solutions supported by Energy Commission to further advance implementation and integration of OCPI into existing EVSE. Our only concern is the timeline to complete and validate this integration process appears to be ambitious (1/1/2020), and would require further technical and funding resources to meet this deadline. From our purview, a network of public and private (technical universities, corporations, etc.) partnerships will need to be formed into order to advance this requirement under this timetable.

Off-grid and renewable energy chargers will be an important component of the EV charging network. Paired Power appreciates the opportunity to inform the Energy Commission and Center for Sustainable Energy on these important topics. We thank you for your consideration of these recommendations and look forward to the release of final requirements for the CALeVIP incentive program.

Sincerely,



Tom McCalmont

CEO

Paired Power, Inc.