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eMotorWerks Comments on Modifications to Alternative and Renewable Fuel and Vehicle Technology Program 2018-2019 Investment Plan

Additional submitted attachment is included below.

September 14, 2018

California Energy Commission
1516 9th Street
Sacramento, CA 95815

Re: eMotorWerks Comments on Modifications to Alternative and Renewable Fuel and Vehicle Technology Program 2018-2019 Investment Plan Update

Dear Commissioners and Staff,

eMotorWerks respectfully submits these comments on the California Energy Commission's (CEC's) 2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP). Specifically, we respond to the September 7, 2018 notice alerting stakeholders to the modification of proposed funding levels to harmonize with the allocations and requirements set forth in the adopted 2018-2019 California budget.

eMotorWerks is a California-based leader in the EV charging market with more than 33,000 units of residential and commercial EVSE products installed worldwide. The company's cloud-based software platform, JuiceNet™, enables electric vehicles to become part of the smart grid ecosystem. JuiceNet™ is embedded in eMotorWerks' JuiceBox™ Level 2 EVSE—the best-selling EV charger on Amazon—which is manufactured locally in Fremont, California.

eMotorWerks supports the overarching goals of the ARFVTP Investment Plan, “to develop and deploy innovative technologies that transform California’s fuel and vehicle types to help attain the state’s climate change policies.” ARFVTP investments to date have been pivotal in helping mature the market for alternative-fueled vehicle technologies. We believe that the 2018-2019 Investment Plan Update submitted May 11, 2018 continues this trend by proposing \$277.5 million in funding to address high-priority barriers and opportunities that optimally enable each alternative fuel and vehicle technology to contribute to the state’s numerous energy and climate goals.

On September 7, 2018, the CEC sent an email to stakeholders explaining that the originally-proposed 2018-2019 ARFVTP budget of \$277.5 million must be scaled back due to a lower program allocation in the California state budget that was approved for the same time period. As explained by the CEC, the proposed modifications to the funding allocations in the 2018-2019 Investment Plan Update are as follows:

1. Funding for the Electric Vehicle Charging Infrastructure allocation is proposed to be reduced from \$134.5 million to \$94.2 million.
2. Funding for the Hydrogen Refueling Infrastructure allocation is proposed to be reduced from \$92 million to \$20 million because current law restricts the Energy Commission from allocating more than \$20 million per year for light-duty hydrogen refueling infrastructure.

3. Funding for the Low-Carbon Fuel Production and Supply allocation remains the same at \$25 million; however, the allocation will now be funded equally from both the Greenhouse Gas Reduction Fund and the Alternative and Renewable Fuel and Vehicle Technology Fund. The allocation was previously approved to be funded from the Greenhouse Gas Reduction Fund only.
4. Funding for the Manufacturing and Workforce Development allocation and the Advanced Freight and Fleet Technologies allocation remain the same at \$8.5 million and \$17.5 million, respectively.

eMotorWerks regrets the circumstances that have required this necessary action by the CEC, but supports the proposed modifications each category's funding allocation. Specifically, eMotorWerks commends the CEC for maintaining the originally-proposed \$8.5 million allocation for Manufacturing and Workforce Development (M&WD). As described above, eMotorWerks is a California-based company that manufactures its EVSE hardware in-state, and plans to compete for M&WD funds to develop our manufacturing capabilities and California-based workforce. Furthermore, we urge the CEC to no further reduce the allocation for Electric Vehicle Charging Infrastructure beyond \$94.2 million. We agree with the CEC's assessment that support is still needed to develop EV charging infrastructure at workplaces, multi-family housing, public sites, and corridors, and also plan to vie for these funds to support our deployment of EVSE at these sites.

Again, thank you for the opportunity to comment on these modifications, and we look forward to working with the CEC and other state agencies to meet California's greenhouse gas and pollution reduction goals through the decarbonization of the transportation sector.

Sincerely,

/s/ Marc Monbouquette

Marc Monbouquette
Senior Manager, Regulatory and Government Affairs
eMotorWerks