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*Comment Received From: Marc Monbouquette
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eMotorWerks Comments on CEC EPIC Grant for Emerging Technology Manufacturing

Additional submitted attachment is included below.

October 17, 2018

California Energy Commission
1516 9th Street
Sacramento, CA 95815

Re: eMotorWerks Comments on Electric Program Investment Charge (EPIC) Solicitation to Scale-Up Production of Emerging Energy Technologies

Dear Commissioners and Staff,

eMotorWerks respectfully submits these comments on the California Energy Commission's (CEC's) anticipated EPIC solicitation for grant funding to help clean energy start-up companies migrate small-scale production lines to larger-scale manufacturing facilities in California. Specifically, we request clarity on technology eligibility for the grant as it pertains to managed electric vehicle (EV) charging and energy storage.

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

The CEC, in an October 8, 2018 email, alerted stakeholders to a planned EPIC solicitation for grant funding to assist California companies in scaling manufacturing of emerging energy technologies. As explained by the CEC, applicants must meet the following criteria to be eligible for the solicitation:

- Be a private company located in California.
- Provide proof of successful demonstration(s) of their technology in California.
- Have a technology in one of the following categories:
 - Energy Efficiency
 - Renewable Electricity Generation
 - Storage

eMotorWerks urges the CEC to clarify in this EPIC grant's solicitation materials that smart EV charging, or V1G, will qualify under the Energy Storage category for purposes of this solicitation. With this interpretation, companies that manufacture smart EVSE capable of performing V1G would be eligible to receive grant funding through this EPIC solicitation. As demonstrated in recent reports from Lawrence Berkeley National Lab (LBNL) and the Rocky Mountain Institute, V1G can provide functionally equivalent flexibility services as standalone energy storage for purposes of integrating renewable energy, at a fraction of the cost.¹ For instance, LBNL

¹ J. Coignard et al., "Clean vehicles as an enabler for a clean electricity grid," <http://iopscience.iop.org/article/10.1088/1748-9326/aabe97#erlaabe97s3>; G. Fitzgerald et al., "Electric Vehicles as Distributed Energy Resources," https://rmi.org/wp-content/uploads/2017/04/RMI_Electric_Vehicles_as_DERs_Final_V2.pdf



estimates that California ratepayers could realize around \$1.5 billion of savings by utilizing V1G flexibility services to integrate its renewable energy targets instead of standalone energy storage.

eMotorWerks is one of the foremost providers of V1G services in the EV charging industry and has plans to scale our in-state EVSE manufacturing to meet increased customer demand for smart Level 2 EVSE. We appreciate your consideration of these comments and hope to compete for a share of this grant funding to support the expansion of our manufacturing activities.

Sincerely,

/s/ Marc Monbouquette

Marc Monbouquette
Senior Manager, Regulatory and Government Affairs
eMotorWerks

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