

**DOCKETED**

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**eMotorWerks Comments and Questions regarding the CEC ARFVTP  
Manufacturing & Workforce Development Procurement**

*Additional submitted attachment is included below.*

October 17, 2018

California Energy Commission  
1516 9th Street  
Sacramento, CA 95815

Re: eMotorWerks  
Comments and Questions from eMotorWerks  
regarding the ARFVTP Manufacturing & Workforce Development Procurement  
by the California Energy Commission

Dear Commissioners and Staff,

eMotorWerks respectfully submits these comments on the California Energy Commission (CEC)'s anticipated ARFVTP Manufacturing & Workforce Development Procurement.

About eMotorWerks. 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. eMotorWerks produces electric commodities from its fleet of EVSEs and offers these commodities in the CalISO wholesale markets.

CEC staff workshop. The CEC staff conducted a workshop/webinar entitled Pre-Solicitation Concept for ZEV Infrastructure Manufacturing Projects on October 15, 2018, in which eMotorWerks participated. These comments follow up on the workshop.

1. Relationship of the ARFVTP program to the EPIC program. How does the Electric Program Investment Charge (EPIC) solicitation to help California companies scale-up production of emerging energy technologies to meet customer demand differ from/overlap with the ARFVTP Manufacturing & Workforce Development Procurement?

2. Rebuttal to the suggestion of a set-aside for certain technologies, such as hydrogen refueling. eMotorWerks disagrees with the suggestion that a fixed portion of the funds available be set aside for hydrogen fueling or any other sector. The scoring criteria that the CEC has set out for the solicitation are clear; each proposal should compete strictly on the merits. This program is no place for affirmative action. In race-based affirmative action, there are ethnic groups that have been unfairly disadvantaged by past discrimination and therefore deserves special consideration. This is entirely justified. However, in the case of this solicitation, there is no technology that has been unfairly disadvantaged by past discrimination. If certain sectors are not capable of standing on their own feet for this solicitation, they should seek support from other programs better suited to their TRL.

3. Recommendation to increase the % of grant funds available to workforce development. eMotorWerks supports an increase of the funds available for workforce development from 10% to between 25% and 50% of the total budget for a project.

4. Recommendation to allow a different allocation of cost sharing among different line items. eMotorWerks recommends that the solicitation specifically allow a different allocation of cost sharing among different line items, as long as the average cost sharing is at least 50-50. For example, a proposal might ask for the CEC to pay for 100% of one task, while the applicant proposes to pay for 100% of another task of equal or greater cost.

The reason for this recommendation is that CEC support for certain activities may be treated differently for purposes of financial reporting by the company receiving CEC support. For example, the accounting treatment of capital equipment is different from the accounting treatment of workforce training. Hence, allowing this differential allocation of cost sharing will make the program more attractive to some applicants, while preserving 100% of the benefit for the CEC and the State.

5. Recommendation for a higher score for proposal with a higher cost share. Does the CEC intend that applicants that propose a higher cost share (i.e., better leverage for public funds) receive a higher score? Please specify what the CEC's intent is in this regard.

eMotorWerks recommends that the solicitation specifically provide that applicants that propose a higher cost share receive a higher score.

6. Adjustment from proposed grant amounts. If the CEC receives more meritorious proposals than can be funded, will the CEC offer grant amounts reduced from the amounts requested, so as to maximize the number of successful proposals?

We appreciate your consideration of these comments and hope to compete in this solicitation to support the expansion of our manufacturing activities in California.

Sincerely,

Steve Taber

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