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Additional submitted attachment is included below.

October 17, 2018

California Energy Commission
1516 9th Street
Sacramento, CA 95815

Re: eMotorWerks Comments regarding CEC ARFVTP Manufacturing & Workforce Development Procurement

(Note: these comments supersede those filed in TN Number 225020)

Dear Commissioners and Staff,

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

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 CAISO 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. eMotorWerks seeks clarification on how the Electric Program Investment Charge (EPIC) solicitation to help California companies scale-up production of emerging energy technologies to meet customer demand differs from or overlaps with the ARFVTP Manufacturing and Workforce Development Solicitation.

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. 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 Technological Readiness Level.

3. Recommendation to increase the percentage 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 allows for a different allocation of cost sharing among different line items, as long as 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 that 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 scoring proposals based on cost share. eMotorWerks recommends that solicitation materials clarify that the CEC will score applicants more highly if they propose to take on a higher cost share. We posit that applicants that take on a higher cost share within their proposals can leverage public funds to a greater degree and better achieve intended program outcomes.

6. Adjustment from proposed grant amounts. eMotorWerks seeks clarification on whether the CEC plans to offer applicants reduced grants from the amounts requested if the CEC receives more meritorious proposals than can be funded. In this way, the CEC would be able to maximize the number of successful proposals that result from the program.

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