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Docket Number:	18-ALT-01
Project Title:	2019-2020 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program
TN #:	229459
Document Title:	Greenlots Comments on Regarding the 2019 2020 ARFVTP Investment Plan Update
Description:	N/A
Filer:	Tami Haas
Organization:	Greenlots
Submitter Role:	Public
Submission Date:	8/16/2019 8:42:42 AM
Docketed Date:	8/16/2019

Submitted via email to AB118@energy.state.ca.us

June 12, 2019

David Hochschild, Chairman
Kevin Barker, Deputy Director
California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814-5512

Re: Comments of Greenlots Regarding the 2019-2020 Alternative and Renewable Fuel and Vehicle Technology Program Investment Plan Update

Dear Chairman Hochschild and Deputy Director Barker:

Greenlots, a wholly owned subsidiary of Shell New Energies, would like to express our deep gratitude to the California Energy Commission ("Energy Commission") for your demonstrated leadership in electric vehicles. We appreciate the opportunity to submit comments regarding the 2019-2020 Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP) Investment Plan Update, and we believe our comments align with the state's goals to advance electrification across all weight classes and sectors and will enable the state to reach its priorities regarding job creation, industry cluster development, emissions reduction, and electric vehicle adoption.

Greenlots is a California-headquartered firm and is a leading provider of electric vehicle (EV) charging software and services that are committed to accelerating transportation electrification in California and beyond. The Greenlots network and advanced energy management services support a significant percentage of the DC fast charging infrastructure in North America, and an increasing percentage of the Level 2 infrastructure. Greenlots' smart charging solutions are built around an open standards-based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic EV charging loads and respond to local and system conditions. These advanced energy management tools allow end users and site hosts to control costs and more intelligently manage their electric vehicles.

California has set assertive and ambitious near-term goals for reducing emissions, with 50% renewable energy generation and the deployment of at least five million zero-emission vehicles and 250,000 charging stations. Greenlots commends the Commission's continued leadership in supporting attainment of these goals through key programs and initiatives, including the ARFVTP. Moreover, Greenlots is proud to be an ongoing partner and participant in this and a variety of the Commission's other key programs that support transportation electrification in California. These programs provide funding assistance that remains critical in supporting and accelerating the transition to zero-emission vehicles and achieving the state's environmental and air quality goals.

Greenlots further commends the Commission for investing over $800 million through ARFVTP to date, including over $95 million for EV charging infrastructure, and over $43 million for manufacturing projects. These two subsets of the broader ARFVTP budget are critical in both closing the EV charging infrastructure gap, while supporting the growth of the industry, innovation, and economic development in California across both hardware manufacturing and software development. As shown by the latest funding programs for CALeVIP as well as the manufacturing solicitations, there is significant demand for this funding by legitimate projects, and we'd encourage continued and increased funding in EV charging infrastructure and manufacturing in the 2019-2020 plan.

While the market has grown tremendously since the start of ARFVTP, we are not yet at an industry maturity level whereby incentives do not matter. More often than not, infrastructure incentives create a tipping point for site hosts and end users as to whether or not they want to go electric and install infrastructure. We cannot underscore enough how important they are to nurturing this EV growth curve and ensuring continued market momentum.

As it relates to manufacturing incentives for EV charging infrastructure, there are few incentives that exist to enable investment in building out a product line or expanding a facility. California is an attractive location to do business given the intellectual capital here, but the cost of doing business in the state does not always come cheap—especially with regard to investment in equipment and real estate. As such, we would encourage continued investment in manufacturing funding to create a more level playing field for firms who want to stay here and continue to invest within the state but need additional financial help to make those plans a reality.

Greenlots appreciates the opportunity to provide these comments, and the Commission's consideration of them. Greenlots thanks the Commission for its continued leadership in supporting and accelerating transportation electrification in California, and looks forward to working collaboratively in support of the state's ambitious goals.

Sincerely,

Thomas Ashley
VP, Policy