

DOCKETED

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*Comment Received From: Paul D. Hernandez (Envoy Technologies Inc.)
Submitted On: 9/6/2019
Docket Number: 17-EVI-01*

**Comments of Envoy Technologies Inc. (‘‘Envoy’’) to the Staff
Workshop on the 2020 CALeVIP Incentive Projects**

Envoy is pleased to submit comments in response to the Staff Workshop on the 2020 CALeVIP Incentive Projects (‘‘Workshop’’).

Please reach out to Paul D. Hernandez, Envoy’s Director of Public Policy & Government Relations, regarding any questions or for clarifications regarding our comments, and thank you for review of our comments.

Thank you,

-Paul D. Hernandez

Additional submitted attachment is included below.



**TO: Attn: Brian Fauble
California Energy Commission
Docket Unit, MS-4
Docket No. 17-EVI-01
1516 Ninth Street
Sacramento, CA 95814-5512**

**Re: Comments of Envoy Technologies Inc. (“Envoy”) to the Staff
Workshop on the 2020 CALeVIP Incentive Projects and 2020
CALeVIP Projects Workshop Presentation**

September 6, 2019

Dear Energy Commission:

Envoy is pleased to submit comments in response to the Staff Workshop on the 2020 CALeVIP Incentive Projects (“Workshop”). Through these comments, we provide brief update of Envoy’s progress as an Electric Vehicle (EV) car share provider, express our interest as a CALeVIP stakeholder, and request definitional clarifications.

I. Update on Envoy

Envoy is rapidly growing its EV car sharing fleet statewide and has established a series of public-private partnerships. Under ARV-17-012¹ and ARV-17-013,² Envoy is working with Energy Commission to deploy 60 EVs for car sharing in the multi-unit dwelling (MUD) sector (Sacramento and Bay Area). Envoy is also partnering with Electrify America (EA) under the Sacramento Green City Initiative, and is currently deploying a large fleet throughout the region, including a high volume of vehicles in direct support of low income communities (LICs) and disadvantaged communities (DACs).³ Moreover, through a utility partnership, Envoy is working with Peninsula Clean Energy to deploy an

¹ Website Access: https://ww2.energy.ca.gov/business_meetings/2017_packets/2017-12-13/Item_06c_ARV-17-012.pdf

² Website Access: https://listserver.energy.ca.gov/business_meetings/2017_packets/2017-12-13/Item_06d_ARV-17-013.pdf

³ LIC and DAC are defined consistent with CalEnviroScreen 3.0.

EV car sharing pilot. Based on these partnerships, as well as through growth in our market rate portfolio, Envoy anticipates upward growth trends for the foreseeable future.

Relatedly, Envoy is seeking to identify how to maximize the use of resources (such as CalEVIP), to support our growth, and as such considers itself a stakeholder in CalEVIP.

II. Clarification Requested: Definition of “Shared Use”

Envoy generally uses assigned and dedicated EVSE infrastructure within MUDs. As such, Envoy seeks clarification on what constitutes “shared use” (as detailed on slide 17 of the workshop presentation). Specifically, Envoy would encourage Energy Commission to clarify if EV car sharing (that is assigned to a specific EVSE) is considered “shared use.”

In addition, Envoy would encourage Energy Commission to provide guidance on alternative “shared use” options. As an example, Envoy envisions that dual chargers (e.g. one parking stall with assigned EV car sharing, one side unassigned for wider community use), could also constitute a “shared” system. Such systems could be leveraged to encourage both EV cars sharing as well as EV ownership (purchase or lease), which would be to the benefit of the entire EV community.

Moreover, to ensure streamlined messaging of what constitutes “shared use”, Envoy would recommend Energy Commission to consider adopting a statewide definition that is uniformly applied across all CalEVIP regional programs. Such uniformity would encourage EV car sharing companies to explore CalEVIP as statewide accelerant, which would be of benefit of all EV car sharing stakeholders.

III. Policy Alignment

Such modification would strengthen alignment with California’s wider EV cars sharing initiatives. EV car sharing is consistent with the 2013⁴ and 2016⁵ ZEV Action Plans, both of which prioritize car sharing, and goals focused on EV and EVSE deployment in MUDs, DACs, and in support of LMI households.⁶ It also aligns with the Safeguarding California Plan: 2018 Update, which prioritizes deployment of car sharing in affordable

⁴ 2013 ZEV Action Plan states the goal to: “Promote privately financed ZEV-based car sharing programs throughout the state.” Website Access: [http://opr.ca.gov/docs/Governors_Office_ZEV_Action_Plan_\(02-13\).pdf](http://opr.ca.gov/docs/Governors_Office_ZEV_Action_Plan_(02-13).pdf)

⁵ 2016 ZEV Action Plan states the goal to “Increase familiarity of ZEVs by promoting ZEV use in car sharing services, rental car opportunities, and carpool and vanpool programs.” Website Access: https://www.gov.ca.gov/wp-content/uploads/2017/09/2016_ZEV_Action_Plan.pdf

⁶ 2016 ZEV Action Plan seeks to: “Make home charging easy to install and use, with a special focus on Multi-Unit Dwellings (MUDs), disadvantaged and low- and moderate-income communities.” Website Access: https://www.gov.ca.gov/wp-content/uploads/2017/09/2016_ZEV_Action_Plan.pdf

housing.⁷ Moreover, the Clean Energy in Low- Income Multifamily Buildings Action Plan prioritizes coordination of EV car-sharing programs with new affordable housing developments, car-sharing programs to increase access to ZEVs for low-income and DACs, and coordination of EV charging infrastructure and car- sharing programs.⁸ Most recently, EV car sharing is referenced within the Electric Vehicle Charging Station Permitting Guidebook as an innovative approach to parking challenges.⁹ As such, clarification of EV car sharing eligibility will be well-timed and aligned with statewide policy focus on expanding car sharing.

IV. Conclusion

Envoy appreciates the opportunity to provide our comments before the Energy Commission. We are eager to identify ways to streamline the use of CALeVIP as an EV car sharing accelerant within the MUD sector, and respectfully request further guidance and clarification on the definition of “shared use.” Please reach out to Paul D. Hernandez, Envoy’s Director of Public Policy & Government Relations, regarding any questions or for clarifications regarding our comments.

Respectfully Submitted,

/S/ Aric Ohana

Aric Ohana
Co-Founder
Envoy Technologies Inc.

and

/S/ Paul Hernandez

Paul D. Hernandez
Head of Public Policy & Government Relations
Envoy Technologies Inc.

⁷ *Clean Energy in Low-Income Multifamily Buildings Action Plan Draft (Page B-2)*, states the goal to “coordinate multifamily building projects with the ZEV Investment Commitment, which includes funding for projects installing zero-emission fueling infrastructure and car-sharing programs to increase access to ZEVs for low-income and DACs.” And the goal to: ““coordinate EV car-sharing programs with new affordable housing developments with EV charging spaces.” Website Access:

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=2ahUKEwiBhL6Gm_3cAhVIFjQIHSCMBHcQFjAAegQIAxAC&url=https%3A%2F%2Fenergy.ca.gov%2Fgetdocument.aspx%3Ftn%3D223600&usg=AOvVaw2x5ZVpBYqYZk5hBNBJi4Oy

⁸ https://www.energy.ca.gov/business_meetings/2018_packets/2018-11-07/Item_06.pdf

⁹ CALIFORNIA GOVERNOR’S OFFICE OF BUSINESS AND ECONOMIC DEVELOPMENT; *Electric Vehicle Charging Station Permitting Guidebook*; Website Access: <http://businessportal.ca.gov/wp-content/uploads/2019/07/GoBIZ-EVCharging-Guidebook.pdf>