

DOCKETED

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Greenlots Comments on Staff Workshop on Medium and Heavy-Duty Vehicle Solicitation Concepts

Additional submitted attachment is included below.



November 8, 2019

Docket No. 19-TRANS-02
-Via e-file-

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Comments of Greenlots on Staff Workshop on Medium and Heavy-Duty Vehicle Solicitation Concepts

Greenlots submits these comments following the California Energy Commission's ("CEC" or "the Commission") workshop to present medium and-heavy duty vehicle solicitation concepts under the Clean Transportation Program held on October 25, 2019.

Greenlots is a leading provider of electric vehicle ("EV") charging software and services committed to accelerating transportation electrification across California, and a wholly-owned subsidiary of Shell New Energies. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America, and a growing percentage in the Level 2 charging space. 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 electric vehicle charging loads and respond to local and system conditions.

California has set foundational goals for reducing emissions with 50% renewable energy generation and deploying at least five million zero-emission vehicles by 2030, as well as deploying 250,000 charging stations, including 10,000 Direct Current fast charging stations by 2025. Greenlots applauds the state's and CEC's leadership in making progress and developing programs aimed at achieving these and related goals, and looks forward to continued development and execution of further goals.

Programs incorporating the unique needs of medium and heavy-duty vehicles are critical elements of a comprehensive strategy to accelerate transportation electrification and meeting the state's greenhouse gas goals. To this end, Greenlots appreciates the efforts of Commission Staff and Commissioner Monahan and is encouraged by the significantly increased \$30 million proposed allocation to medium and heavy-duty vehicles and infrastructure in the 2019-2020 Clean Transportation Program Investment Plan Update.

Based on the concepts and information presented at the October 25 workshop, Greenlots wishes to make one critical overarching point for the Commission to consider for both best addressing market needs, and most efficiently allocating and disbursing the proposed funding allocation: the need for charging infrastructure is immense and immediate, heightened recently by CARB's decision to remove charging infrastructure funding from HVIP. For this reason, there is need to evolve program design beyond its current once-a-year grant solicitation format utilizing

individual grant awards, to a structure that can more quickly and efficiency support the deployment of charging infrastructure.

Therefore, Greenlots encourages exploration of shifting to an ongoing, continuous, rolling application funding program for charging infrastructure. In exploring this, Greenlots makes the strong point that this program should not copy entirely the structure of the existing CALeVIP program, which can benefit from further improvements. Instead the Commission should use this as an opportunity to build on that model to create a program that can better reward creativity, value, and cost efficiencies, while deploying and funding medium and heavy-duty charging infrastructure in a more efficient manner.

Greenlots looks forward to continued participation in this process and exploration of these ideas for creating a more efficient program. Greenlots thanks the Commission for consideration of these comments, and its ongoing efforts to support transportation electrification and advanced mobility.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Ashley', with a stylized, cursive script.

Thomas Ashley
VP Policy, Greenlots
tom@greenlots.com