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**CESA's Comments on DER Strategies for MDHD BEV Integration GFO
Concept**

Additional submitted attachment is included below.

January 10, 2020

Email to: docket@energy.ca.gov

Docket Number: 19-ERDD-01

Subject: Response to Request for Comments on Grant Funding Opportunity Concept

Re: Comments of the California Energy Storage Alliance (CESA) on the Grant Funding Opportunity Concept of Distributed Energy Resource (DER) Strategies for Medium- and Heavy-Duty Battery Electric Vehicle Charging Infrastructure

CESA appreciates the opportunity to comment on the development of the Grant Funding Opportunity (GFO) Concept to explore the targeted use of distributed energy resources (DERs) to enable faster and more cost-effective integration of charging infrastructure for medium- and heavy-duty (MD/HD) battery electric vehicles (BEVs). CESA is a 501(c)(6) organization representing over 80 member companies across the energy storage industry and is involved in a number of proceedings and initiatives that address the various strategies and barriers related to growing the energy storage market to support a more reliable, cleaner, and more efficient electric grid. With our background and expertise, CESA hopes to help inform the California Energy Commission (CEC) staff on additional considerations for the focus and approach of this GFO concept.

The CEC generated a thought-provoking and insightful list of questions to guide the focus and research approach of this GFO concept. In our comments, rather than addressing every question posed in this request for comments, CESA instead offers a general recommendation to broaden the consideration of DER strategies in this GFO to also include in-front-of-the-meter (IFOM) energy storage solutions that can, possibly in supplement with other onsite DER strategies, produce cost-effective MD/HD BEV charging infrastructure integration as well as actionable insights on future policies and approaches to support the state's transportation electrification goals.

Comments

CESA observes that the GFO concept appears to be tailored for behind-the-meter (BTM) DER strategies that leverage managed charging strategies and/or onsite DERs (*e.g.*, load management, solar, storage) to achieve the research objectives. On the one hand, such BTM strategies should absolutely be a vital part of the toolkit. Especially as significant levels of BTM DERs are being deployed today and into the future, it makes logical sense to think of ways in which these DERs can be operationalized to reduce costs and impacts to the distribution grid while leveraging revenue streams from the provision of different grid services to offset capital and/or upgrade costs.

On the other hand, there may be certain use cases or applications where IFOM energy storage solutions would provide the scale to support MD/HD BEV charging infrastructure buildout. With such large power capacity draws required of such MD/HD BEVs, there may be siting or economic challenges to sizing BTM DERs so large to mitigate bill impacts from demand charges and/or upgrade costs to increase the distribution/hosting capacity of specific distribution circuits, feeders, substations, etc. IFOM storage could play a role in such cases as a non-wires alternative that enables a higher penetration of MD/HD BEVs by ensuring distribution infrastructure stays within their rated thermal or voltage limits when drawing power from the grid. In city centers and denser urban environments, there may be opportunities to deploy IFOM energy storage solutions as a land- and space-efficient MD/HD BEV integration solution. In remote areas (*e.g.*, long-distance corridors, highways, rural areas), IFOM energy storage may also prove to be a cost-effective and less complex MD/HD BEV integration solution that obviates or reduces the need to extend significant distribution infrastructure.

In sum, CESA is excited to see the development of this GFO concept and is interested to see the various proposals submitted by applicants on their innovative DER technologies and strategies. As the CEC moves forward with the GFO concept, CESA seeks to ensure that the CEC also be open to accepting proposals from applicants with IFOM DER strategies.

Conclusion

CESA appreciates the opportunity to provide these comments and feedback on the GFO concept. We look forward to collaborating with the CEC and would be happy to answer any further questions.

Sincerely,

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