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*Comment Received From: Stable Auto
Submitted On: 5/26/2020
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**Stable Auto's Public Comments on the CEC's CTP BESTFIT
Innovative Charging Solutions**

Additional submitted attachment is included below.



Stable

Stable Auto Corporation
1999 Bryant Street
San Francisco, CA 94111

May 26, 2020

California Energy Commission
Docket No. 19-TRAN-02
1516 Ninth Street
Sacramento, CA 95814

Re: Stable Auto's Public Comments on the CEC's CTP BESTFIT Innovative Charging Solutions

Stable Auto appreciates the opportunity to provide input on the California Energy Commission's (CEC) Clean Transportation Program (CTP) BESTFIT Innovative Charging Solutions. We applaud the State of California and the California Energy Commission for their commitment to achieving the state's zero-emission vehicle (ZEV) goals, greenhouse gas reduction targets, and air quality standards. Stable is proud of California's leadership and ambitious goals for clean energy emission standards and vehicle electrification, including 5 million zero-emission vehicles (ZEVs) on the road by 2030, 250,000 EV Charging Stations deployed by 2025, and 100% of California's electricity to come from renewable or zero-carbon resources by 2045.

Stable Auto is committed to helping the state reach these goals by building software and automation tools that help electric vehicle service providers (EVSPs) and fleet operators maximize utilization of charging stations and vehicles. This is done through siting, automating on-site operations, and by coordinating the use of each station via software that fleets can use to integrate with their own fleet routing applications to reserve and manage vehicle charging in real-time.

With approximately 23% of the power drawn at public DC Fast Chargers in California coming from transportation network company (TNC) vehicles that comprise less than 1% of all EVs in California,¹ Stable believes urban fleets need their own charging infrastructure. If smartly coordinated this infrastructure can be shared by multiple fleets and fleet sectors. While Stable understands the need for vehicle sector definitions into Light-duty and Medium and Heavy-duty classes, Stable believes purposefully built charging sites can serve both light-duty and some medium-duty classes such as package delivery. Stable suggests adding language to the solicitation that will allow for both light-duty and medium-duty fleets use the same charging infrastructure.

Stable would like to address the CEC's question of applicant eligibility and suggests the CEC provide a definition for each applicant category. Stable Auto considers itself a software provider that partners with fleets, EVSPs, and charging station hardware providers. We suggest allowing software providers to be eligible as the lead applicant provided that they have a charging station owner and operator partner.

Stable thanks the CEC for consideration of our suggestions; we look forward to continuing to work with the CEC on innovative business models and technologies that will accelerate fleet electrification in California. Please feel free to contact me if you have any questions.

Sincerely,
Rohan Puri
CEO, Stable Auto

¹Jenn, A. (2019). Emissions Benefits of Electric Vehicles in Uber and Lyft Services. UC Davis: National Center for Sustainable Transportation.