DOCKETED	
Docket Number:	20-TRAN-04
Project Title:	Electric Vehicle Infrastructure Project Funding
TN #:	238845
Document Title:	WeaveGrid Comments on MUD and Rural Light-Duty EV Charging Concepts
Description:	N/A
Filer:	System
Organization:	WeaveGrid
Submitter Role:	Public
Submission Date:	7/13/2021 4:36:31 PM
Docketed Date:	7/13/2021

Comment Received From: WeaveGrid
Submitted On: 7/13/2021
Docket Number: 20-TRAN-04

WeaveGrid Comments on MUD and Rural Light-Duty EV Charging Concepts

Additional submitted attachment is included below.

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July 13, 2021

California Energy Commission
Docket Unit
Re: Docket No. 20-TRAN-04
1516 Ninth Street
Sacramento, CA 95814

Subject: WeaveGrid comments on Pre-Solicitation Workshop Presentation for MUD and Rural Light-Duty EV Charging Concepts 2021-06-28, Docket No. 20-TRAN-04

WeaveGrid appreciates the opportunity to provide comments on the Pre-Solicitation Workshop Presentation for Multi-Unit Dwellings (MUD) and Rural Light-Duty EV Charging Concepts.

WeaveGrid is a California-based vehicle-grid integration (VGI) software company that uses vehicle telematics – the intelligence and connectivity already embedded in electric vehicles (EVs) – and utility data to offer an interface for utilities to engage with automotive manufacturers and EV drivers. The onboard computer of EVs records and reports charging-related data, such as state of charge, energy, and power draw, and the communications technology of EVs can be employed to read charging data and manage charging remotely, without a dedicated interface device. By leveraging integrations with automotive manufacturers and gaining authentication from drivers who opt in to share their data securely, WeaveGrid offers utilities both aggregated charging data and the ability to manage charging for enrolled EV customers. WeaveGrid is a market leader in providing these solutions, which are being successfully deployed in multiple utility programs across the United States.

Investments in the California Energy Commission (CEC) Clean Transportation Program (CTP) signals the state's strong commitment to zero-emission vehicle goals. WeaveGrid appreciates the

CEC's focus on MUD and rural EV charging with grant funding opportunities because increasing access for these market segments is necessary in order to support widespread adoption of EVs. Further, we recognize the strategic approach that CEC is taking and see CEC's emphasis on replicability as being particularly important since solutions must be able to scale as adoption in California increases.

During the June 28, 2021 Pre-Solicitation Workshop focused on Light-Duty Electric Vehicle Infrastructure Projects for Rural and Multi-Unit Dwelling Residents, CEC staff posed a series of questions for stakeholder input.[1] In particular, WeaveGrid would like to respond to the question of "Does equipment need to be network capable and be networked (i.e., have a networking agreement)?"

WeaveGrid appreciates the CEC's continued thoughtfulness on VGI issues and the acknowledgement that technology is an important enabler for widespread adoption of electric vehicles. Focusing only on networked charging equipment solutions, however, may be too narrow. While there are merits for networked chargers, residents, site hosts, and EV drivers can benefit from utilizing a broader set of technologies that are well-positioned to generate the outcomes that CEC is intending, provide more data and visibility on charging behavior for optimization, and be more cost-effective. WeaveGrid recommends that CEC consider a broader scope of eligible technologies to deliver optimized EV charging. For example, residential EV charging can be managed using vehicle telematics, which is compatible with any level or kind of electric vehicle supply equipment (EVSE), including non-networked Level 1 and Level 2 chargers.

Opening up eligibility to not just networked chargers but other technologies, including telematics-based charging solutions, can increase access to electric mobility and participation in available managed charging programs. Managed charging programs not only help meet important climate, power sector, and transportation electrification goals, but can also help residents utilize lower cost charging infrastructure and reduce utility bills. Furthermore, telematics-based charging solutions often provide a streamlined, intuitive EV driver interface and can deliver important transmission, distribution, and local data to utilities and other load-serving entities.

As such, WeaveGrid recommends against requiring network capable charging infrastructure in its MUD and rural EV charging solicitations. However, if CEC does decide to require charging equipment to have network capabilities, we ask that the five-year networking agreement requirement be removed, allowing greater flexibility for residents, site hosts, and EV drivers to use the most convenient and cost-effective managed charging solutions available.

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[1] https://www.energy.ca.gov/event/workshop/2021-06/staff-pre-solicitation-workshop-light-duty-electric-vehicle-infrastructure

Thank you again for the opportunity to comment. We are happy to discuss our comments further and look forward to seeing this solicitation progress and help meet the state's transportation electrification goals.

Sincerely,

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