

DOCKETED

Docket Number:	21-ALT-01
Project Title:	2021-2022 Investment Plan Update for the Clean Transportation Program
TN #:	239900
Document Title:	WeaveGrid Comments on 2021-2023 Investment Plan Update for the Clean Transportation Program
Description:	N/A
Filer:	System
Organization:	WeaveGrid
Submitter Role:	Public
Submission Date:	9/30/2021 3:27:07 PM
Docketed Date:	9/30/2021

*Comment Received From: Amanda Myers
Submitted On: 9/30/2021
Docket Number: 21-ALT-01*

**WeaveGrid Comments on 2021-2023 Investment Plan Update for the
Clean Transportation Program**

Additional submitted attachment is included below.



WeaveGrid

222 7th Street, 2nd Floor
San Francisco, CA 94103
weavegrid.com | 650-590-9021

Amanda Myers
Policy & Regulatory Affairs Manager, West
amanda@weavegrid.com

September 30, 2021

Commissioner Patricia Monahan
California Energy Commission
1516 9th Street
Sacramento, CA 95814

Subject: WeaveGrid Comments on 2021–2023 Investment Plan Update for the Clean Transportation Program, Docket No. 21-ALT-01

WeaveGrid appreciates the opportunity to provide comments on the California Energy Commissions (CEC or Commission) 2021-2023 Investment Plan Update for the Clean Transportation Program (CTP or Program).¹

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 (i.e., the assessment of the energy left in a battery), 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 successfully deployed in utility programs across the United States.

¹ California Energy Commission, Revised Staff Report, 2021-2023 Investment Plan Update for the Clean Transportation Program, September 2021. <https://www.energy.ca.gov/event/meeting/2021-09/clean-transportation-program-investment-plan-advisory-committee-meeting>

The investments outlined in the Revised Staff Report of the Investment Plan Update Clean Transportation Program indicate the state's strong commitment to zero-emission vehicle (ZEV) goals. Such investments will help California continue to grow EV adoption swiftly.

WeaveGrid appreciates the suite of proposed investments, including Clean Transportation Program and General Funding investments towards zero-emission light-duty vehicle infrastructure and eMobility, medium- and heavy-duty vehicles and infrastructure, drayage, transit, school buses, manufacturing, and workforce training and development.

In particular, WeaveGrid commends the CEC on its proposed light-duty vehicle infrastructure and eMobility Clean Transportation Program investments through the Update's Program years and General Funding investments in 2021-2022, especially given the support needed in this timeframe to achieve California's 100% zero-emission passenger vehicle sales by 2035 target.² WeaveGrid acknowledges that the light-duty EV technology is more mature today than medium- and heavy-duty EV technology. However, the aggressive nearer-term targets, the unique needs for household consumer uptake, and the broad recognition that the market is not yet transformed collectively call for continued, steady, and significant investment. Public funding that is consistent over time is necessary to support the market for both businesses and EV drivers and helps to rapidly transition the sector to zero-emission. This is particularly true if there is to be more equitable light-duty electric vehicle access. Furthermore, WeaveGrid supports the CEC's focus on public and shared-access charging infrastructure within these light-duty infrastructure investments to increase EV adoption. This will undoubtedly increase consumer confidence in choosing to go electric.

WeaveGrid appreciates that the CEC states its commitment to enabling smart charging and vehicle-grid integration (VGI) in the Investment Plan Update.³ In any forthcoming smart charging and VGI programs and solicitations, the CEC should seek to ensure that the requirements are technology neutral. Rather than selecting one type of technology to elicit optimized charging benefits, the CEC ought to instead allow any technology, hardware or software, to participate in programs provided they meet minimum technical requirements. In particular, WeaveGrid hopes to see the CEC increase its technology inclusion beyond networked chargers to vehicle telematics software, which can also be used to support smart charging and VGI. Increasing technology options can help maximize the cost savings that the CEC cites for smart charging and VGI, not to mention boost the overall benefits as well as participation, scale, and consumer choice. Smart charging and VGI can also reduce distribution needs for EVs and complement clean energy and distributed energy resource integration goals, thereby effectively making the electric fuel cleaner.

² Revised Staff Report, Table 5, p. 37.

³ Revised Staff Report, Innovations in Charging Technology and Use Cases, p. 47.

We thank the CEC for consideration of these comments.

Sincerely,

/s/ Amanda Myers

Amanda Myers

Policy and Regulatory Affairs Manager, West

Weave Grid, Inc.

Telephone: 650-590-9021

Email: amanda@weavegrid.com