

**DOCKETED**

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**VIA ELECTRONIC FILING**

September 30, 2021

California Energy Commission  
Re: Docket No. 21-ALT-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Re: Comments on 2021-2022 Investment Plan Update for the Clean Transportation Program**

Veloce Energy respectfully files these comments on the “2021-22 Investment Plan Update for the Clean Transportation Program” that Staff presented at the 2<sup>nd</sup> Advisory Committee Meeting for the Clean Transportation Program on September 16, 2021.

Veloce Energy is a California-based provider of EV charging solutions, committed to accelerating the electrification of transportation through technology and business model innovation. Veloce’s solution supports modular and flexible charging infrastructure, with the intent to streamline deployment and provide resiliency.

We commend the Commission for its continued focus on the deployment of charging infrastructure to drive transport electrification across customer and vehicle segments through its various initiatives. As the Commission develops and funds new charging infrastructure programs, we urge that it incentivizes the deployment of Distributed Energy Resources (DERs) such as battery energy storage systems (BESS) and other behind-the-meter technologies that would drive cost efficiencies by reducing or eliminating unnecessary distribution system upgrades and service interconnection inefficiencies on both the customer side and utility side of the grid. In many utility territories today, capital-intensive based earning mechanisms discourage the use of DERs and Non-wires Alternatives (NWA) as cost-effective solutions to legacy grid upgrade practices. These incentives to invest in grid upgrades are not only causing delays in deployment of charging infrastructure, they are also burdening the ratepayer through increased electricity rates. These higher costs can be easily mitigated through existing and emerging advanced load management (ALM) technologies, as well as innovative tariffs that encourage managed charging through smart, interoperable charging networks.

While demand response (DR) and Time of Use (TOU) rates as means of load management are fairly common, the use of DERs & NWAs as means to safely connect customer load that exceeds the total rated capacity of a customer connection is currently underutilized vis-à-vis charging infrastructure. The latter solution can avoid the need to upgrade an existing customer site with a new service connection, customer-side panel upgrade, or utility-side distribution system upgrade,

as demonstrated by Pacific Gas & Electric (PG&E), where savings between \$30,000 to \$200,000 per project within its EV Charge Network Program were achieved at 20 sites.<sup>1</sup> Southern California Edison notes that “Type 2 ALM could have a potential for significant cost reduction and avoidance of major construction or upgrades by utilizing the existing capacity to the largest extent.”<sup>2</sup> Behind-the-meter stationary BESS co-located with EV chargers is an example of such ALM2 solutions.

In addition to being a cost-effective grid upgrade solution, BESS is also critical in ensuring system resiliency, especially as extreme weather events become increasingly frequent, resulting in power outages and blackouts.

We are encouraged by the Commission’s decision to incentivize DERs such as energy storage in the upcoming CARTS solicitation, and appreciate similar incentives in programs that target multi-unit dwelling and rural charging facilities, as well as charging infrastructure for the medium-heavy duty vehicle fleet categories.

Veloce Energy appreciates the opportunity to submit these comments.

**BONNIE DATTA**

Advisor, Policy & Partnerships

**Veloce Energy**

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<sup>1</sup> In PG&E’s January 29, 2021 ALM/EV EMS Workshop, Panel 2 Presentation, PG&E indicates that they have deployed Type 2 Advanced Load Management (ALM) at 20 Multi-Unit Dwelling and workplace host sites as of Q4 2020. Type 2 ALM refers to load management used to avoid additional distribution system upgrades.

<sup>2</sup> SCE, Presentation on Transportation Electrification, Charging Infrastructure Programs, Energy Management Systems, presented at EPRI IWC on March 20, 2019.