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Siemens Comments on EnergIIZE

Additional submitted attachment is included below.

SIEMENS

VIA EMAIL

December 3, 2021

To: EnergIIZE Project Team at CalStart

Re: Comments on EnergIIZE Project Design, CEC Docket No. 21-TRAN-04

Siemens files these comments on the "EnergIIZE Commercial Vehicles Project Design" that CalStart and California Energy Commission (Commission) staff presented at the public meeting on November 17, 2021.

Siemens is a leading provider of EV charging infrastructure technology. We were the first major industrial corporation to commit to zero net carbon, in our case by 2030, and are a staunch supporter of programs that help California achieve its decarbonization and transportation electrification goals.

Siemens commends the Commission's effort to deploy charging infrastructure to electrify medium-heavy duty (MDHD) vehicle category to meet the state's ZEV goals. We generally support the EnergIIZE Program as presented in the public meeting. We have the following comments:

1. EQUIPMENT ELIGIBILITY

The EV charging equipment eligible for the program should be expanded to include on-site battery storage. Such storage is utilized in EV charging stations where it reduces the total costs by managing demand charges or reduces interconnection costs. This can be particularly important in DACs and rural areas where the existing grid is often less robust. As such, storage can reduce the total cost of providing charging infrastructure. As well, storage enhances reliability by enabling charging to occur during power outages, including PSPS events.

2. VENDOR ELIGIBILITY

The workshop slides included as both an Approved Vendor and a Preferred Vendor, "An individual or organization who aids in the completion of a ZEV infrastructure site." This definition is overly broad and would include even minor service or equipment providers. Vendor qualification should focus on – and be limited to – vendors that participate substantially in site completion. This will streamline the process, because minor vendors of equipment or subcontract service providers will not have to go through the qualification process.

3. FUNDING LANES

EV Fast Track should be a competitive process, in line with the other three funding pipelines. If done efficiently, the competitive process should slow things only marginally but will ensure that the best proposals are provided with grant funding. The application period can be very short. Given the rapid speed with which the many market participants already act in California, there is no justification for funding a

higher cost or less valuable project just because the application is submitted five minutes earlier than the better project.

4. INTEROPERABILITY

Interoperability is a critical principle for granting any public funding for EV charging infrastructure, already recognized in multiple CEC, CPUC, and CARB regulations – as well as the Federal Infrastructure and Investment Jobs Act recently signed by President Biden.[1] Interoperability protects customer choice, increases competition, lowers costs, and minimizes the risk of stranded assets.

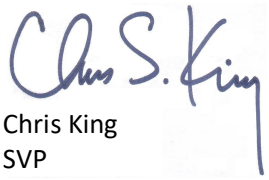
The equipment eligibility should require that any EnergIIZE funded EVSEs and back-end software comply with standards already adopted by the CEC for other programs, such as the OCPP requirement for CALeVIP-funded chargers. Equipment should also have to be safe; i.e., UL or NRTL certified.

(Note: CALeVIP requires the ability to support OCPP, language which allows for EVSEs to be deployed using proprietary technology and not actually allowing for the replacement of either the software or the hardware by a different vendor. To meet the CEC's goals of interoperability, OCPP "support" should be verified by an independent test lab, just as UL verifies safety compliance.)

As a major participant in all the elements of EV charging – equipment, software, engineering and installation services, EVSP services, and more – Siemens would appreciate being included in any further stakeholder engagement activities related to EnergIIZE.

Siemens appreciates the opportunity to submit these comments.

Sincerely,



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[1] HR 3684 – 117th Congress (2021-2022), November 15, 2021, p. 2650.