

DOCKETED

Docket Number:	20-TRAN-04
Project Title:	Electric Vehicle Infrastructure Project Funding
TN #:	241037
Document Title:	Beam Global Comments - Light-Duty Electric Vehicle Infrastructure Allocation Workshop
Description:	N/A
Filer:	System
Organization:	Beam Global
Submitter Role:	Public
Submission Date:	12/21/2021 1:03:05 PM
Docketed Date:	12/21/2021

*Comment Received From: Beam Global
Submitted On: 12/21/2021
Docket Number: 20-TRAN-04*

Light-Duty Electric Vehicle Infrastructure Allocation Workshop

Additional submitted attachment is included below.



California Energy Commission
Dockets Office
1516 9th Street
Sacramento, CA 95814

RE: Light-Duty Electric Vehicle Infrastructure Allocation Workshop; Docket #2-TRAN-04

BEAM is pleased to provide comments to the California Energy Commission's (CEC) Light-Duty Electric Vehicle Infrastructure Allocation Workshop that was hosted on 12/2/2021. We thank the CEC staff for its time and thoughtful consideration on these new funding concepts and potential program changes to Clean Transportation Program.

BEAM designs, manufactures, and sells sustainable EV charging infrastructure solutions that serve dual functions as emergency preparedness equipment and energy resiliency assets. BEAM systems are Made-in-America products that are manufactured in California. The flagship EV ARC™ charging system is the only 100% renewable, movable, grid independent, and it fits in a standard parking space. It requires no electrical work, no construction, and can be deployed in minutes.

Microgrids, Resiliency, and Charging Concept

Should this program only be open to existing CEC-funded microgrid projects to help them expand their EV charging capabilities?

- Funding should be open to all microgrid projects, not just existing CEC-funded microgrid projects. Limiting this potential solicitation to just existing CEC funding recipients would stifle innovation and lock out new entities from participating in taxpayer funded grant opportunities.

Should funding be for the whole microgrid or just the charging aspects be available through this program?

- Funding should be available for the microgrid and EV charging aspects of the project.

BESTFIT 2

Should the three areas of focus remain the same, or are there other challenges we should consider addressing?

- CEC should remain committed to addressing new challenges within this solicitation. BESTFIT was originally designed to demonstrate innovative EV charging solutions for light-duty and medium- and heavy-duty vehicles and work to accelerate the successful commercial deployment of these



technologies. Under that original charter, CEC should be open to changes in the program to address different technology and use cases challenges to foster innovation.

Should the three areas of focus remain the same, or are there other challenges we should consider addressing?

- We believe the original three focus areas are well designed, but we recommend adding a “Improved EV Charging Deployment Leadtime” focus area to improve deployment times of EV charging stations. Long lead times are a large factor in a lot of EV charging project falloff. Implementation of AB 970 will start to address the issue, but more needs to be done to improve the speed of EV charging deployment within the state.

Should we have a 2-phase application (initial five-page abstract, followed by a full application if the abstract passes?)

- A two-phase application process with a five-page abstract is preferred. Substantial resources, time, and effort go into preparing to respond to a grant solicitation. A five-page abstract process would allow an entity to gauge where their concept stands without diverting too many resources.

Block Grants for Light-Duty EV Charging Infrastructure

Should projects be regionally targeted, statewide, or offer both?

- Projects should be statewide and regionally targeted. While we understand the original intent of regionally targeted block grants, the geographical constraints can make it difficult to participate. If there was a statewide option, it would be easier to meet the state's EV charging deployment goals.

What other project concepts should be considered for light-duty EV charging infrastructure incentive project?

- While the CEC has done well at incentivizing traditional grid-tied EV charging projects across the state, there has been a lack of funding opportunities for other non-conventional EV charging projects. The physical, cyber, and public safety power shutoff vulnerabilities to the grid are too great to ignore. We need investments and research into how we can ensure the continuity of our charging network.



The CEC should consider creating funding opportunities for other non-conventional charging types including, but not limited to; off-grid, all-inclusive solar EV charging, portable, battery storage, and other emerging technologies.

As the federal government looks to make transformative investments in EV infrastructure, the Government Services Administration (GSA) started to evaluate how they would address EVSE in a draft RFQ released in July 2021. In their respective breakdown of EVSE they list Level 1, Level 2, and DC Fast Charging as typically seen in industry, but they expand on that to include off-grid/solar and portable chargers. We believe the CEC needs to start viewing off-grid in the same light and make sure programs provide incentives that reflect the true cost of the technologies.

BEAM appreciates the opportunity to provide comments on the Light-Duty Electric Vehicle Infrastructure Allocation Workshop and thanks the CEC for its ongoing work to advance the deployment of transportation electrification. Please reach out if you have any questions.

Thanks,

Brad Groters