

**DOCKETED**

<b>Docket Number:</b>	20-TRAN-04
<b>Project Title:</b>	Electric Vehicle Infrastructure Project Funding
<b>TN #:</b>	241048
<b>Document Title:</b>	WeaveGrid Comments on Light-Duty EV Funding Allocation
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Weave Grid Inc.
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	12/21/2021 3:29:57 PM
<b>Docketed Date:</b>	12/21/2021

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

## **WeaveGrid Comments on Light-Duty EV Funding Allocation**

*Additional submitted attachment is included below.*



**WeaveGrid**

December 21, 2021

California Energy Commission  
715 P Street  
Sacramento, CA 95814

**RE: WeaveGrid Comments on Light-Duty Electric Vehicle Infrastructure Allocation Workshop: Funding Ideas for Light-Duty Electric Vehicle Charger Infrastructure Projects – Docket No. 20-TRAN-04**

Weave Grid, Inc. (“WeaveGrid”) submits these comments to the California Energy Commission (“CEC” or “the Commission”) in response to the Staff Workshop on Funding Allocations for Future Electric Vehicle Charging Projects presentation.<sup>1</sup>

WeaveGrid is a software company that helps utilities increase the adoption of electric vehicles (“EVs”) through greater understanding of customer charging behaviors, managed charging programs, and distribution-level optimization.

WeaveGrid’s technology leverages utility and charging data, including the embedded vehicle telematics—data, controls, and communication systems— to transform unpredictable and disaggregated EV charging loads into a cohesive network of controllable grid resources. Our approach enables customers to participate in utility programs without installing specific chargers or onboard diagnostic devices. WeaveGrid is a market leader in providing these solutions, which we are deploying in utility programs across the United States.

WeaveGrid is supportive of the potential light-duty EV charging infrastructure projects presented during the workshop. These project concepts indicate Staff’s ability to identify EV charging needs to support widespread transportation electrification in California.

In particular, WeaveGrid is interested in the Low-Income Residential Charging funding project.<sup>2</sup> A vast majority of charging happens at the home, and it is imperative to make this convenient charging use case available for as many Californians as possible, regardless of income. Low- and moderate-income Californians are more likely to live in older homes, and

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<sup>1</sup> Light-Duty Electric Vehicle Infrastructure Allocation Workshop: Funding Ideas for Light-Duty Electric Vehicle Charger Infrastructure Projects Presentation, December 2021, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=240727>

<sup>2</sup> Presentation, slides 37-40.

installations of EV chargers in older buildings are more likely to trigger costly electrical upgrades.

Staff posed the following question on Slide 40 of the presentation: “Are there target applicants besides the electric vehicle service providers (EVSPs) or residents that we should be considering?” We believe that this solicitation should allow for telematics-based managed charging software providers, such as WeaveGrid, the opportunity to participate. The CEC often requires networked chargers for EV infrastructure solicitations, but these come at a much higher cost, using funding less efficiently and prompting more expensive installations. On the other hand, non-networked chargers or lower power chargers can perform managed charging when using telematics-based software to manage charging. Most electric vehicles on the road today have the data, controls, and communication systems for managed charging, and those capabilities and costs do not need to be duplicated in the charger, especially as EV adoption expands beyond early adopters to the mass market. We recommend the CEC offer the option for either networked chargers or non-networked chargers paired with telematics-based managed charging service.

WeaveGrid appreciates Staff’s thoughtfully prepared light-duty EV funding concepts. We look forward to continued engagement and thank the Commission for consideration of these comments.

Respectfully submitted,

/s/ Amanda Myers

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