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Docket No 21-OIR-03 â€“ Comments of AMPLY Power on the California Energy Commissionâ€™s Proposed Amendments to the Load Management

Additional submitted attachment is included below.

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February 9, 2022

California Energy Commission
Docket Unit, MS-4
Re: Docket 21-OIR-03
Sacramento, CA 95814

Re: Docket No. 21-OIR-03 – Comments of AMPLY Power on the California Energy Commission's Proposed Amendments to the Load Management Standards

I. Introduction

AMPLY Power, Inc. ("AMPLY") appreciates the opportunity to respond to the California Energy Commission's ("CEC") Docket Number 21-OIR-03, Proposed Amendments to the Load Management Standards. We respectfully submit our responses to this Docket for your consideration. Our hardware- and use case-agnostic approach is intended to be a scalable platform for light-, medium- and heavy-duty fleets to electrify 100 percent on an accelerated basis.

AMPLY is a comprehensive charging and energy management provider for electric vehicle fleets focused on reducing costs and environmental impact. We offer a proven, scalable ecosystem of cloud-based software, onsite hardware, and customer-centric service to simplify charging operations for fleets operating trucks, buses, vans, and light-duty vehicles.

OMEGA™ CMS, AMPLY's proprietary charge management system, optimizes charging for lowest cost energy, while offering improved resilience and reliability, all in a user-friendly dashboard. AMPLY actively manages and monitors fleet operators' electric vehicles and chargers, dynamically responding to events in real-time.

Several key features that distinguish OMEGA from other platforms include:

- Guaranteed 99.9 percent vehicle uptime to ensure vehicles are ready to perform their duty cycle at the start of every shift
- Automated Load Management to enable 2x charger capacity without utility service upgrades
- Cost- and battery-optimized fleet charging
- Automated demand response participation and other utility grid services
- Customized compliance and operational reporting
- Integration with bespoke telematics, route, and asset management tools
- Active electric vehicle and EVSE monitoring and alerts
- A single point of contact for monitoring, service level alerts, maintenance, and repairs
- Interoperability with EVs and EVSEs, energy management, and vehicle-to-grid integration

- Distributed energy resource (DER) management, integration, and interaction, including microgrid solar and storage

AMPLY's Charging-as-a-Service (CaaS) offers electric vehicle fleets a comprehensive solution where we assume responsibility for all aspects of charging your electric vehicle fleet – from EVSE procurement and installation, to ongoing operations and hassle-free maintenance. With CaaS, we guarantee electric vehicle fleet performance in exchange for a price-per-mile-driven fee that bundles CapEx, OpEx, energy, and incentives into a fixed rate, allowing fleet operators to forecast and manage costs long-term.

II. AMPLY Supports the CEC's Proposed Load Management Tariff Standard

AMPLY supports the CEC's proposed regulatory language requiring utilities to submit a plan to comply with a Load Management Tariff Standard no later than six months after the effective date of these standards. The proposed standard requires that a utility develop marginal cost rates and submit them to the CPUC. It would also require a utility to upload its time-dependent rates applicable to its customers to the CEC's Market Informed Demand Automation Server (MIDAS) database. Finally, the proposed regulation would require utilities to develop a single statewide standard tool for authorized rate data access by third parties. While AMPLY supports the CEC's Proposed Load Management Tariff Standard, we encourage the CEC to more clearly delineate the following points throughout the proposed regulation:

- The cost rates utilities will develop over the implementation time horizon along with the target timelines for these rates.
- The number of cost rates that utilities will be required to implement at year one.
- The total timeline to develop and include all cost rates established by utilities.
- Whether tariffs with a certain structure will be prioritized.
- Whether the scope of this proposal is aimed at residential, business, or some subset of tariffs.

III. Enabling Load Monitoring and Management Solutions on Utility Infrastructure

The CEC's Proposed Load Management Tariff Standard underscores the importance of enabling load monitoring and management solutions on utility infrastructure to support the utilization of Automated Load Management (ALM) software in electric vehicle charging applications. AMPLY believes that enabling load monitoring and management equipment on customer-side infrastructure is another important solution that can help empower customers to manage load and related infrastructure costs, enabling deeper benefits for all ratepayers. For example, equipment such as current transformers (CTs) provide a safe way of monitoring electrical current flowing in an AC transmission line. They are an important component of an ALM system that includes both hardware and software, which can help avoid the need to upgrade an existing customer site with a new service connection, customer-side panel upgrade, or utility-side distribution system upgrade. In short, enabling load monitoring and management

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equipment on customer-side infrastructure will help encourage more electric vehicle adoption by helping to maximize the number of chargers on an existing service connection and lowering the total cost of ownership for electric vehicles and charging site hosts.

Currently, there are utilities that prohibit the installation of third-party electrically connected equipment in utility-owned infrastructure. If a program participant opts to have a utility install and own the customer-side infrastructure (make-ready), load monitoring and management equipment, such as CTs cannot be added. If a program participant wants to install CTs in customer-side infrastructure, the program participant can opt to construct and own the customer-side infrastructure and receive a rebate of eighty percent of the utility cost to install standard infrastructure or eighty percent of participant cost (whichever is less).

Load monitoring tariffs and load management equipment on customer-side infrastructure will help strengthen customer choice by ensuring that proposed utility investments empower customers to manage load and related infrastructure costs, enabling deeper benefits for all ratepayers. AMPLY appreciates the opportunity to provide comment on this proposed regulation and looks forward to continuing to collaborate with the CEC on refining policies and investments that advance California's climate, equity and economic goals.

Sincerely,

/s/Heidi Sickler

Heidi Sickler
Director of Policy
AMPLY Power