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Beam Comments on Draft ZIP

Additional submitted attachment is included below.



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

RE: Draft Zero-Emissions Vehicle Infrastructure Plan; CEC-600-2022-045; Docket #21-TRAN-03

BEAM is pleased to provide comments to the California Energy Commission's (CEC) Draft Zero-Emissions Vehicle Infrastructure Plan (ZIP). We thank the CEC for their thoughtful work on the draft ZIP and for soliciting stakeholder input.

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 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.

Emerging Technologies

We thank the CEC for the inclusion of the "emerging technologies" market segment and we view it as a positive step to provide them with parity to conventional charging types that have been highly subsidized. We are also pleased to see wireless charging and mobile charging units housed in this new market segment. We urge the CEC to build on this category to include "transportable charging" as well. We believe transportable charging solutions should meet the principals below:

Transportable Principals:

- Does not require a connection to the electrical grid
- Generates and stores electricity at point of load
- Invulnerable to centralized grid failures
- Can be deployed/relocated without construction or demolition work
- Rapidly deployed

The Grid Cannot Accommodate Near-Term Infrastructure Goals

During the January 20th workshop introducing the original ZIP concept, many of the public comments were centered around the need for resiliency and to ensure the continuity of the state's charging network in event of grid failures, PSPS events, wildfires, natural disasters, cybersecurity threats, and we echo the same sentiment. With the ZIP focusing on "grid-readiness", it is a step in the right direction, but more needs to be done to ensure the continuity of the state's charging network.



During the May 6th California Independent System Operator (ISO) meeting, officials stated they were preparing for a 2022 scenario that could see California fall short of energy demands by about 1,700 megawatts during the summer. In June 2021, ISO issued Flex Alerts to conserve energy during peak periods, which included EV charging.

With vocal stakeholder concerns, and ISO issuing these warnings, we disagree with the Draft ZIP's assessment that grid can accommodate near-term infrastructure goals. If ISO is issuing warnings not to charge at certain peak times, the grid clearly cannot handle the current EV charging demand already placed on the grid. However, we do believe ongoing planning will help prepare the grid for reliance and reliability.

While interim planning is developed, CEC should consider creating a market segment for funding opportunities for other non-conventional charging types including, but not limited to: off-grid, all-inclusive solar EV charging, portable, and battery storage technologies. Establishing this market segment ensures resiliency and continuity of charging in California.

BEAM appreciates the opportunity to provide comments on the draft ZIP and thanks the CEC for its ongoing work to advance the deployment of transportation electrification. Please reach out if you have any questions.

Thanks,

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