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VE Comments NEVI June 28 2022

Additional submitted attachment is included below.

VIA ELECTRONIC FILING

June 28, 2022

Caltrans & California Energy Commission
Re: Docket No. 22-EVI-03

Re: Comments on IIJA/NEVI Program, California State EV Infrastructure Deployment Plan

Veloce Energy files these comments on the "California State Electric Vehicle Infrastructure Deployment Plan" (Plan) that Caltrans and California Energy Commission ("Agencies") staff presented at the public meeting on June 14, 2022.

Veloce Energy (Veloce) is a California-based provider of EV charging solutions, committed to accelerating the electrification of transportation through technology and business model innovation. Veloce's solution supports modular and flexible charging infrastructure, with the intent to accelerate deployment, drive cost efficiencies, and provide resiliency.

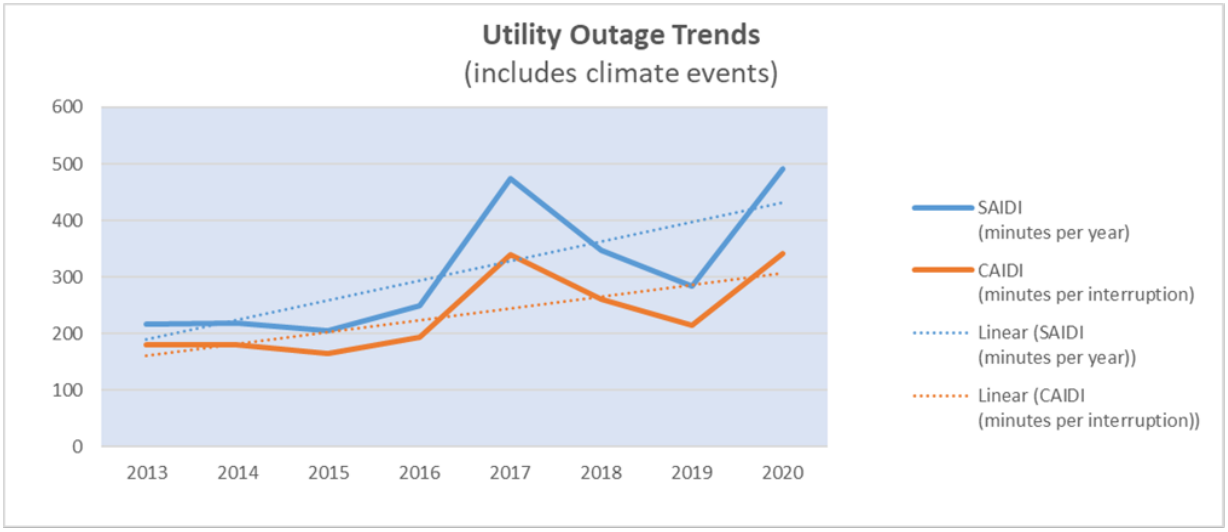
Veloce supports the Agencies' deployment plan overall and submits the following comments to ensure that the Plan incorporates technologies that will lead to a cost and time efficient deployment of the accessible charging infrastructure along the designated Alternative Fuel Corridors (AFC).

1. Use of NEVI funds

We would like to highlight and reiterate the Agencies' comment that in addition to the traditional charging items listed by staff in the workshop presentation (slide #7), battery energy storage systems (BESS) that are co-sited with the charging infrastructure are covered by the NEVI funds. This would be in alignment with the federal guidelines from DOE & DOT.

Given the potential locations of these charging sites along the AFCs, the need for power resiliency and reliability will be critical to ensure charging accessibility 24/7 and achieving 97% up time. As extreme weather events become increasingly frequent, resulting in power outages and blackouts, including through the public service power shuts off (PSPS) events throughout much of the State, resiliency is paramount, as chargers without power will not serve their intended purpose.

The figure below illustrates nationwide trends showing ongoing increases in SAIDI and CAIDI, including major climate events such as wildfires and hurricanes, but not including PSPS.



Source: EIA

Distributed Energy Resources (DER) whether they be microgrids, BESS, or on-site solar/wind co-sited with BESS drive cost efficiencies and time to deploy **by reducing or eliminating unnecessary utility distribution system upgrades and service interconnection inefficiencies.** Given the expected site locations of some of the NEVI funded charging stations, DERs could play a vital role as substitutes for utility service size constraints. For example, if a charging site needs 1MW of capacity to support the total connected load, and the service connection to that site can support only 500kW of load, the remaining 500kW can be provided through BESS and/or a combination of BESS with on-site generation such as solar.

Regarding site capacity, we urge the Agencies to add further flexibility. Page 30 of the Plan states that NEVI-qualifying sites must have "site power capacity of not less than 600 kW." More specifically, the NEVI guidelines specify that four chargers much be able to charge simultaneously. This requirement can be achieved with a site interconnection of less than 600 kW, provided storage is available on site – Veloce is working with several customers to address exactly this issue. This is particularly applicable in rural sections of the AFCs, where utility grid capacity is less robust, and can provide substantial cost savings on the interconnection both in front of and behind the meter. Accordingly, we recommend that the Plan be modified to allow BESS to be included in the definition of "site capacity."

2. Contracting Process

Veloce is a strong proponent of public funding being awarded via a competitive process, therefore we express our support for the process outlined in the Plan. However, we recommend that the stakeholder groups involved in the solicitation consultation phase not be limited to just "*EV charger service providers and station owners/EV charger manufacturers and network providers"* (slide #23/Plan#38) and instead be open to **all technology providers** involved in provision of **charging infrastructure broadly defined** as well as diverse business models involved in

provision of charging services such as Charging as a Service operators (CaaS) and not just the traditional EV Service Providers (EVSP).

In this connection, we also wish to voice our support for the expressed intent in the Plan to be neutral in its approach on applications that intend to upgrade existing sites versus developing new sites. The Agencies should ensure that any existing site that apply is not a recipient of prior public funding – this will broaden the pool of applicants versus deepening the same.

3. Implementation

Veloce supports the Agencies expressed intent to treat as a floor the federal regulations [1] that will set the minimum standards and requirements for projects funded by the NEVI Formula Program. The equipment eligibility should require that all chargers and network software, support and utilize third-party certified interoperability standards such as OCPP. This is key for technology providers such as Veloce whose solutions are charger agnostic and, therefore, require open protocols across charger vendors.

Veloce Energy appreciates the opportunity to submit these comments.

BONNIE DATTA
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Veloce Energy

[1] Department of Transportation, Federal Highway Administration Docket No FHWA-2022-0008