

DOCKETED

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VIA ELECTRONIC FILING

September 30, 2022

California Energy Commission
Re: Docket No. 19-TRAN-02
715 P Street
Sacramento, CA 95814

Re: Comments on Electric School Bus Bi-Directional Infrastructure Funding Concept

Veloce Energy files these comments on the “Electric School Bus Bi-Directional Infrastructure Funding Concept” (Concept) that California Energy Commission (Commission) staff presented at the public workshop on September 13, 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 restricts its comments to the technology and charging equipment eligibility under this funding concept.

We commend the Commission for ensuring that behind-the-meter (BTM) Distributed Energy Resources (DER) such as “solar generation, stationary battery storage...”¹ are being included under the “reimbursable project costs” as well as “charging equipment eligibility”.

However, to align with the state’s goal for a high DER future, simply making these costs eligible is not a sufficient incentive for their deployment. The Commission should construct the funding program in a manner that rewards applications that include DERs co-located with charging infrastructure.

DERs such as battery energy storage systems (BESS) play a critical role in deploying charging infrastructure through cost efficiencies and faster time to deploy **by reducing or eliminating unnecessary utility distribution system upgrades and service interconnection inefficiencies on both the customer side and utility side of the meter.** Utilizing DERs to safely connect customer load that exceeds the total rated capacity of a customer connection avoids the need to upgrade an existing customer site with a new service connection, customer-side panel upgrade, or utility-side distribution system upgrade, as demonstrated by Pacific Gas & Electric (PG&E), where

¹ Funding concept presentation, slide # 11

savings between \$30,000 and \$200,000 per project within its EV Charge Network Program were achieved at 20 sites.²

Moreover, BESS perform as grid assets by managing and mitigating demand. We highlight, in this connection, Electrify America’s announcement that it has installed BESS at 140 DCFC stations across the U.S., including more than 90 in California. In addition to being a cost-effective grid upgrade solution that mitigates peak demand, BESS is critical in ensuring resiliency, especially 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.

Given the myriad benefits of co-locating DERs such as BESS with charging infrastructure, the Commission needs to amend its “charging equipment eligibility” in this program **to incentivize** BTM DERs. The inclusion should be reflected in the **program scoring criteria** with points being allocated under **costs** (since DERs positively impact capital and operating costs), **reliability**, and **sustainability**.

Veloce Energy appreciates the opportunity to submit these comments.

BONNIE DATTA

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Veloce Energy

² In PG&E’s January 29, 2021, ALM/EV EMS Workshop, Panel 2 Presentation, PG&E indicates that they have deployed Type 2 Advanced Load Management (ALM) at 20 Multi-Unit Dwelling and workplace host sites as of Q4 2020. Type 2 ALM refers to load management used to avoid additional distribution system upgrades.