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PowerFlex Comments Revised Investment Plan

Additional submitted attachment is included below.

PowerFlex appreciates the opportunity to comment on and support the California Energy Commission's (CEC's) Revised Staff Report *2022-2023 Investment Plan Update for the Clean Transportation Program* (Revised Investment Plan). PowerFlex has installed and operates nearly 10,000 level 2 (L2) electric vehicle supply equipment (EVSE) in California and has engaged with the CEC on numerous EVSE incentive programs. Based on our experience, PowerFlex offers the following comments.

Allocate Funding to Programs and Sites that Encourage Daytime Charging

PowerFlex urges the Commission to allocate funds recently approved through 2022 legislation to programs and sites that will encourage daytime charging during low greenhouse gas (GHG) emission and grid impact hours. According to the *Avoided Cost Calculator*¹ used by the Public Utilities Commission in several of its proceedings to determine marginal impacts of operating distributed energy resources, solar generation hours have both the lowest marginal GHG emissions and grid costs year-round, and this will increasingly become the case in future years as more solar comes online.

Additionally, a recent report published in *Nature Energy* analyzed the impacts of daytime charging versus nighttime charging in California specifically and found that “[s]hifting drivers from home [i.e. nighttime] to daytime charging improves all metrics of grid impact including ramping, use of non-fossil fuel generation, storage requirements and emissions.”² Consequently, with the need decarbonize electric generation and keep electric rates low to encourage electrification, PowerFlex urges the Commission to allocate recently approved funding to programs and sites that will encourage daytime charging, such as workplaces, public centers, hospitals, or others.

Prioritize Managed Charging

In all EVSE incentive programs, the CEC should encourage and prioritize funding for sites that manage EV charging per the needs of the customer and overall grid. Even while charging during daytime hours, managing load within those hours can greatly improve customer economics and reduce the need for customer- and utility-sited infrastructure, saving customers and ratepayers as a whole. With charging techniques like adaptive load management, EVs can become a grid resource that help integrate renewables and manage the grid.

PowerFlex appreciates the efforts of the CEC to achieve California's carbon and zero emission vehicle goals. PowerFlex supports the CEC's Revised Investment Plan and urges the CEC to prioritize allocating funding to programs and sites that encourage daytime and managed charging.

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¹ https://www.ethree.com/public_proceedings/energy-efficiency-calculator/, accessed October 12, 2022.

² *Charging Infrastructure Access and Operation to Reduce the Grid Impacts of Deep Electric Vehicle Adoption*, Nature Energy, September 22, 2022, Page 9. Accessed at <https://www.nature.com/articles/s41560-022-01105-7>