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Wallbox Comments on Light Duty Funding Solicitation Concepts

Additional submitted attachment is included below.



February 17, 2022

Ms. Patricia Monahan
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Wallbox Comments on Light Duty Funding Solicitation Concepts

Dear Commissioner Monahan and Staff:

Wallbox thanks the California Energy Commission (CEC) for the opportunity to comment on the CEC's upcoming light duty funding program concepts. California continues to lead the way nationally in transportation electrification through implementation of exemplary EV charging public funding programs.

With more than 300,000 chargers sold in over 105 countries to date, Wallbox is a leading global EV supply equipment (EVSE) manufacturer and energy management solutions company with North American headquarters in Mountain View, CA. Wallbox aims to address the challenges of climate and energy management via state-of-the-art EV charging solutions.

Wallbox commends the CEC for thoughtful consideration of the next iteration of light duty funding for EV charging. Through continued investment from the CEC's Clean Transportation Program, the CEC continues to yield transformative power to achieve the level of infrastructure needed for California's electrification goals, including 100% ZEV sales by 2035.¹

As the CEC contemplates an unprecedented number of targeted programs designed to support varied charging use cases, Wallbox urges the CEC to continue balancing robust stakeholder processes, regular updates to SB 1000 and AB 2127, and rapid deployment of funding and infrastructure. Based on the workshop concepts presented, Wallbox is particularly encouraged by the inclusion of Charging at Single Family Homes and Charging At Multi-Family, Affordable Housing Sites programs to further support electrification in the State. With home charging comprising approximately 80% of charging according to the Department of Energy, the need to support single family and multi-family charging is vital.

Wallbox puts forth the following recommendations that balance increasing equitable access to innovative charging technology, leveraging strong private investment, and delivering convenient, reliable charging experience for all drivers:

¹ California moves to accelerate to 100% new zero-emission vehicle sales by 2035, California Air Resources Board, <https://ww2.arb.ca.gov/news/california-moves-accelerate-100-new-zero-emission-vehicle-sales-2035>

Charging at Single Family Homes

- **Structure program incentive tiers with corresponding technologies, including VGI and bidirectional charging:** The at-home charging program is an opportunity for the CEC to show leadership in VGI (vehicle-grid integration) and Vehicle-to-Grid (V2G) through support of smart charging and residential bidirectional chargers deployment. Bidirectional chargers support grid resilience and equip residents with energy management solutions, including the ability to power their homes during grid outages and lower electricity demand through usage of their EVs power during peak grid hours.

The CEC should ensure that bidirectional charging is eligible for the charging at single family homes program and supported at a level that accounts for the higher cost of the nascent technology and installation. Wallbox recommends the CEC explore different tier structures in consultation with industry on technology and installation costs. Tier structures should consider incentives for percentage of installation with an incentive cap, in line with the CEC's Communities in Charge and Golden State Priority Projects.

- **Align program equipment eligibility with current and upcoming battery technology needs:** Wallbox recommends that the program reflect the current and future charging technologies being deployed to support existing and forthcoming battery technologies. To that end, Wallbox recommends that rebates only apply to Level 2 charging technologies as this takes a more customer centric approach to provide them. While Level 1 charging can be an adequate technology for low range plug in hybrids (PHEVs), they are rarely used as ideal charging solutions for battery electric vehicles (BEVs) or larger battery PHEVs. Given that this is the first time the CEC is creating a dedicated single family home charging program, Wallbox further recommends that the CEC should hold a separate workshop to discuss technologies and incentive programs eligible.

Charging at Multi-Family, Affordable Housing Sites

- **To speed up deployment at multi-family sites, utilize a block-style grant program to speed up:** While the currently proposed competitive program style could be more targeted, the state needs to increase the rate at which we deploy charging infrastructure in underserved segments, including multifamily housing. Wallbox recommends the CEC and program administrator structure this program similar to the Communities in Charge program, where eligible site hosts and applicants can apply to the program block grant and be awarded based on factors such as technology, number of chargers, and VGI considerations, including Automatic Load Management Systems and smart charging.
- **Focus the program on on-site, Level 2 charging:** To make the program truly effective for multi-family residential drivers, Wallbox recommends that only multi-family housing sites be eligible for the program. While noting how important having nearby reliable public charging



infrastructure is to underpinning EV adoption, Wallbox points to the multiple existing and forthcoming CEC programs dedicated to deploying public charging infrastructure, including the CALeVIP successor programs, REACH 2.0, and CHILL 2.0. Additionally, Wallbox believes that by maintaining a focus on Level 2 chargers for this program, the CEC will be able to optimize the investment as well as increase the overall scope and reach of deployment.

Conclusion

Wallbox supports the CEC proposed schedule of innovative, complementary charging programs and thanks the CEC for the opportunity to provide program guidance on these select upcoming CEC funding programs.

Wallbox looks forward to supporting the state in the successful deployment of charging infrastructure across California.

Best,

A handwritten signature in black ink, appearing to read "Adam Mohabbat", written in a cursive style.

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