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Shell Recharge Solutions Comments on Light Duty EV Charging Infrastructure Solicitation Concepts

Additional submitted attachment is included below.

February 17, 2023

Docket No. 20-TRAN-04
-Via e-file-

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Post-Workshop Comments of Shell Recharge Solutions on Light-Duty Electric Vehicle Infrastructure Allocations

Dear Commissioners and Staff,

Shell Recharge Solutions submits these comments following the California Energy Commission's ("CEC" or "the Commission") January 26, 2023 workshop on future light-duty electric vehicle ("EV") infrastructure allocation proposals and funding concepts.

Shell Recharge Solutions is a leading provider of electric vehicle charging software and services committed to growing the market for transportation electrification in California. The Shell Recharge Solutions network has been supporting a significant percentage of the DC fast charging infrastructure in North America, and an increasing amount of Level 2 infrastructure. Shell Recharge Solutions' smart charging solutions are built around an open standards-based focus on future-flexibility while helping site hosts, fleets, utilities, and grid operators manage dynamic EV charging loads and respond to local and system conditions.

The Shell Recharge Solutions network is also supporting the deployment of Shell Recharge, which in the U.S. is beginning to be deployed to provide Shell's retail customers – including convenience stores, service stations, and drivers – on the go charging.

Introduction

Shell Recharge Solutions appreciates the effort, including thoughtful planning and analysis by CEC staff in developing the presentations and proposed funding concepts for future Commission-funded light duty EV charging infrastructure programs. Shell Recharge Solutions is broadly supportive of the portfolio of funding concepts presented at the January 26 workshop. The ideas presented represent forward thinking and an appropriate balance between advancing new technologies, developing charging infrastructure in key locations, and advancing EV equity. Below we offer comments on select potential funding concepts discussed during the workshop.

Grid-light and Resilient Charging

Shell Recharge Solutions appreciates this innovative concept and its goal of funding and piloting "grid-light" charging deployments, including the ability to operate during grid outages and reducing the need for grid upgrades. Providing tailored incentives for storage backed charging and piloting novel applications for the pairing of EV charging and stationary storage is an important area to nurture innovation and functional deployments, given the well-studied potential impacts of unmanaged EV charging.

Shell Recharge Solutions encourages a flexible approach to this, where applicants can propose novel applications and concepts broadly within the funding concept's framework, including in outage operation capabilities, and the measurement of "grid-light". We would encourage the location of these charging deployments to include eligibility for locations where grid power or three-phase grid power may not exist or be limited – which may implicate the Commission's coordination with utilities in identifying areas to target.

Cost Effective, Performance Based Charging

This forward-looking concept by the working name "Serving Electric Range for Vehicle Electrification", or "SERVE" presents a novel and flexible approach that would allow industry to propose the most innovative and cost-effective deployments that meet minimum energy throughput targets, while being open to all project types and forms. Shell Recharge Solutions supports this concept, however there may be opportunity to further simplify its approach while achieving its intention of helping to capture deployment types that may not fit into existing CEC solicitations.

Instead of projects being evaluated on estimated energy serving capacity and the validity of these estimates, an alternative could be to simply evaluate projects on their kilowatt throughput capacity in relation to the cost offset sought through the program. This would simplify the approach considerably and represent a straightforward catch-all program for projects that indeed do not fit into existing CEC solicitations, and measure and reward the most cost-effective projects for the Commission based on charging capacity realized. The program could be regionally targeted to also target equity or other goals, and would likely indirectly incentivize projects that will achieve high utilization (and therefore kWh/MWh throughput) as this would be implicitly needed to compete to achieve the lowest sought after cost offset/incentive, in order to be the most competitive (in terms of $/kW requested through the program). This would also mirror effective evaluation metrics and approaches taken by other programs valuing the maximization of incentive dollars.[1]

Charging at Multi-Family, Affordable Housing Sites

[1] See for example, https://www.californiavwtrust.org/wp-content/uploads/CA-VW-Trust-QA-72021.pdf at p. 1 Question 2.

Shell Recharge Solutions supports this concept that would provide a competitive grant solicitation for accessible and reliable charging at project sites within 1/4 mile of an affordable and/or multi-family housing site. Indeed, this would help to increase community benefits from EV charging infrastructure while addressing persistent EV charging access challenges for those living in such housing developments. We believe the solicitation should include and provide appropriately differentiated incentives for DC fast charging, which is often needed to effectively serve drivers in this use case. We encourage eligibility for sites located near either multi-family housing or affordable housing, but encourage CEC to perhaps evaluate providing an additional incentive or scoring bonus for sites near both.

Reducing Drive Times to DC Fast Charging

Shell Recharge Solutions is intrigued by this funding concept, which would focus funding on siting fast charging to provide accessible and reliable charging for low-income and disadvantaged communities. We see merit in an approach where the Commission selects specific areas for DC fast charging development, based on the need to reduce drive times to charging, and then have industry bid to develop charging at that location with cost offset from the Commission and consideration and scoring for other policy goals. As with other funding concepts, we would encourage a flexible approach with respect to the size of the deployment, but believe it appropriate to set minimum kW power output requirements for the chargers, perhaps aligning with the expected minimum NEVI requirement of 150kW.

Curbside DC Fast Charging

This concept would provide funding for projects that offer DC fast charging at curbside or metered parking in partnership with local authorities (cities, counties, etc.), to ensure the continued operation of curbside chargers, which would mostly be installed on public premises. Shell Recharge Solutions supports this concept, which indeed would stand to increase accessible and reliable DC fast charging for EV drivers on-the-go in densely populated areas and encourage its proliferation. To help encourage and maximize utilization, there may be opportunity to encourage partnerships with rideshare operators to drive utilization and minimize average dwell times.

Conclusion

Shell Recharge Solutions encourages Staff's continued gap analysis and innovative program development to advance clean and equitable mobility. We appreciate the Commission's consideration of these comments, and its ongoing efforts to support transportation electrification and advanced mobility.

Sincerely,

Erick Karlen
Director, Policy & Market Development
ekarlen@shellrecharge.com