

DOCKETED

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June 13, 2023

California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Docket 20-EPIC-01
Comments on EPIC 4 Transportation Electrification Scoping Workshop
Presentation

SWTCH appreciates the opportunity to comment on EPIC 4 Transportation Electrification Topics 20-23, and specifically on CEC staff's proposals for incorporating the topics into four proposed Solicitation Topics presented at the May 31, 2023 workshop. SWTCH broadly supports the topics proposed by staff, and **encourages an emphasis on demonstrations in addition to technology-focused research, particularly within Concept 2.**

About SWTCH

SWTCH provides electric vehicle (EV) charging and energy management solutions designed specifically for high-density urban settings. Our innovative, open standards-based platform optimizes EV charging usage to benefit both EV charging station operators and drivers. SWTCH strongly emphasizes load management tools within the charging solutions deployed in the multifamily sectors, and believes there is significant opportunity to shape sees substantial grid value in deploying charging solutions focused on the multifamily property and workplace sectors in California. These types of demonstration projects can provide valuable learnings for utilities and other stakeholders, and are a prudent investment of public dollars in order to inform and shape subsequent at-scale programs.

Comments

SWTCH believes the multifamily sector is well-positioned to serve as a power source during times of grid strain through the use of vehicle-to-grid and vehicle-to-building technology. To scale such strategies, more pilot studies should focus on understanding consumer behavior, participation, and financial implications. Initial pilots are underway in other markets. For example, in October 2022, SWTCH launched a vehicle-to-building demonstration project in Toronto in partnership with Tridel, Ontario's Electrical System Operator, and Kite Mobility. The project uses Nissan Leaf electric vehicles and discharges power back to the building during demand response events, lessening the amount the building needs to draw from the grid. The pilot is focused on determining the economic feasibility of the setup, which incentivizes participation through use of a blockchain-based wallet that tracks credits and debits for vehicle owners participating in events.

In the May 31 workshop, staff posed the question of whether projects under Concept 2 should focus on applied research and technology development, or whether there would be value in demonstrations to collect and analyze real-world data. **SWTCH strongly encourages an emphasis on demonstrations under Concept 2.** While the technology for such a pilot is available, the Toronto study is one of the first of its kind. There remains a significant need to understand consumer behavior and incentives across different markets.

Demonstration and pilot projects can allow stakeholders and funders to learn how to walk before running, metaphorically speaking. They are often a prudent and cost-effective way to test and understand charging behaviors and implications for buildings and the grid, prior to implementing and funding larger programs at scale. Indeed, a demonstration project does not always need to achieve certain performance thresholds to be considered successful. Unintended and unexpected results can often prove equally if not more valuable.


Conclusion

Solicitation Funding Concept 2 – Technology Enablers Using Electric Vehicles as Distributed Energy Resources – can and should be leveraged to support demonstration and pilot projects across the state of California that can be used to understand program design implications on grid benefits and consumer behavior.

SWTCH appreciates the opportunity to comment on the proposed solicitation topics and looks forward to working with CEC staff and other stakeholders to accelerate the grid integration of electric vehicles in the state of California.

If you have questions or if I can provide more information, please contact me at josh.cohen@swtchenergy.com or 202.998.7758.

Respectfully,



Josh Cohen
Head of Policy