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Mobile Battery Energy Storage System (BESS)

Additional submitted attachment is included below.



November 15, 2023

California Energy Commission
715 P Street,
Sacramento, CA 95814

RE: Climate Innovation Program

Dear California Energy Commissioners and Staff,

Moxion Power appreciates the opportunity to provide input on the Climate Innovation Program (Program) and strongly supports the proposed Program and investments to fund technological advancements from California headquartered companies. Moxion is proud to be headquartered in and manufacture our electric, mobile power technology in Richmond, California. The Climate Innovation Program will help achieve the state's greenhouse gas (GHG) reduction targets and climate goals, while highlighting California's leadership in supporting innovative technologies and in-state manufacturing.

Moxion manufactures all-electric, mobile battery energy storage system (BESS) technology to replace fossil-fuel-burning generators for commercial and industrial use, as well as support mobile charging for on-road and off-road all-electric fleets. Moxion's state-of-the-art battery-powered mobile charging unit provides zero-emission power for a variety of sectors including construction sites, zero-emission vehicle (ZEV) fleets, events, utilities, disaster response, and the film industry. Moxion's mobile ZEV charging solution is designed to overcome the most pressing challenges for fleets to adopt and deploy ZEVs – access to fast and easy charging solutions that do not rely on grid power availability. This allows end-users to charge vehicles and equipment more efficiently accelerating electrification and the transition to zero-emission technologies. Moxion is helping the state achieve both its ZEV and infrastructure deployment goals, as well as reducing GHG emissions and criteria pollutants.

Moxion appreciates the California Energy Commission (CEC) hosting the Program development workshop on November 2, 2023, and recommends the following in response to the workshop presentation stakeholder questions:

1. More than 50% of California's GHG emissions are from transportation and existing commercial and residential buildings.¹ Therefore, we respectfully request that the CEC prioritize resilient electrified communities, which includes both buildings and transportation within such communities. We also recommend prioritizing increasing grid reliability through mobile energy storage, transmission, and other distributed energy resources.
2. To maximize the impact of the dollars and support a range of technology stages, we recommend the following grant sizes and uses for the funding:
 - o Grant sizes:
 - Prototype or Pre-commercial Technology – Up to \$15 Million with a 10% match
 - Pilot-stage technology (post-validation) – Up to \$25 Million with a 20% match
 - Early Commercial Adoption – Up to \$50 Million with a 50% match
 - o Use of funding:
 - R&D, system design and architecture, co-development, testing and commissioning, validation, verification, and deployment

¹ <https://ww2.arb.ca.gov/ghg-inventory-data>



3. We respectfully request the inclusion of mobile BESS and mobile charging solutions within the Climate Innovation Program. These technologies provide a wide array of solutions to reduce GHG emissions in the commercial, industrial, and transportation sectors, as well as supporting grid resiliency and reliability.
4. The National Electric Vehicle Infrastructure (NEVI) and the Grid Resilience and Innovation Partnerships (GRIP) may be leveraged for mobile charging solutions and mobile energy storage solutions to increase grid resilience and reliability; however, both programs have constraints.
5. To ensure equity is a focus of this program, we recommend allocating additional points for companies that are located in and provide direct benefits to disadvantaged communities by providing on-the-job training, skills-based development training, and/or partnerships with local community colleges and organizations. We also recommend providing additional points for companies that manufacture their technology innovation in California, as well as their headquarters, because manufacturing offers a greater range of job opportunities.

Moxion appreciates the opportunity to support and provide input on the proposed Climate Innovation Program. We look forward to continuing to work with the CEC on the development of the Program and supporting California's GHG reduction targets and climate goals.

Sincerely,

Alex Meek
Moxion Power