DOCKETED	
Docket Number:	23-ALT-01
Project Title:	2023-2024 Investment Plan Update for the Clean Transportation Program
TN #:	253353
Document Title:	GoPowerEV - Comments to Clean Transportation Program Investment Plan
Description:	N/A
Filer:	System
Organization:	GoPowerEV
Submitter Role:	Public
Submission Date:	11/28/2023 3:38:24 PM
Docketed Date:	11/28/2023

Comment Received From: Miguel Martinez
Submitted On: 11/28/2023
Docket Number: 23-ALT-01

GoPowerEV-Comments to Clean Transportation Program Investment Plan

We urge the California Energy Commission to incorporate low power Level 2 ports with an output of 3.84 kW for all state EVCS and EVSE competitive grant funding opportunities and block grants in the upcoming Investment Plan Update for the Clean Transportation Program.

All competitive grant funding opportunities and block grants encouraging EV charging stations in multi-family parking facilities issued by the California Energy Commission must support the installation of smart Level 1 and low power smart Level 2 ports, without the requirement to have permanently attached charging cords, at multi-family parking properties.

Additional submitted attachment is included below.

GOPOWEREV

GoPowerEV
https://gopowerev.com/

November 27, 2023

Miguel Martinez
Utility SIG Program Manager
GoPowerEV Inc.
2935 Alexis Dr.
Palo Alto, CA

Commissioner Patricia Monahan
California Energy Commission
1516 9th Street
Sacramento, CA 95814

Re: 2023-2024 Investment Plan Update for the Clean Transportation Program

Dear Commissioner Patricia Monahan,

We represent GoPowerEV, a provider of cost-effective EV charging solutions designed to facilitate the transition to electric mobility, especially within multi-family residential settings. Our mission aligns with California's broader environmental goals, and we write to propose specific regulatory adjustments to accelerate the widespread adoption of EV charging stations.

All competitive grant funding opportunities and block grants encouraging EV charging stations in multi-family parking facilities issued by the California Energy Commission must support the installation of smart Level 1 and low power smart Level 2 ports, without the requirement to have permanently attached charging cords, at multi-family parking properties.

The requirement to install low power Level 2 chargers in multi-family parking facilities is codified in the 2022 California Green Building Standards Code, California Code Of Regulations, Title 24, Part 11.

We urge the California Energy Commission to incorporate low power Level 2 ports with an output of 3.84 kW for all state EVCS and EVSE competitive grant funding opportunities and block grants in the upcoming *Investment Plan Update for the Clean Transportation Program*.

A smart outlet is an advanced version of a standard electrical outlet that provides enhanced functionality and connectivity. The GoPowerEV PowerPort3 is a Smart Outlet certified by UL for use as Electric Vehicle Charging Infrastructure. Smart outlets can serve as a cost-effective and flexible solution for EV charging. Subsidy programs requiring EV chargers with integral cords may inadvertently increase

costs and limit the flexibility for users and installers. Integral cords can pose challenges in terms of compatibility with various EV models, maintenance, and potential need for replacements. On the other hand, smart outlets allow EV owners to use their own charging cords, which can be replaced or upgraded easily, facilitating a more user-friendly and adaptable EV charging infrastructure, including being used for charging e-mobility such as scooters and bicycles. Hence, revising subsidy programs to include smart outlets without integral cords can foster a more inclusive, economical, and adaptable approach to accelerating EV adoption and infrastructure deployment.

Low and very low income residents of multi-family properties can barely afford e-mobility transportation and the purchase of used EVs. As such, it makes sense for the *Clean Transportation Program* to adopt measures to encourage the installation of smart Level 1 and low power smart Level 2 ports.

Ubiquitous and equitable installation of smart Level 1 and low power smart Level 2 ports at multi-family parking properties located in low income and Priority Population Areas is vital. Low income and Priority Population areas have the highest incidence of poor air quality.

As a mission-driven clean energy implementation firm, for over 25 years *Energy Solutions* continues to focus on creating large-scale environmental impacts by providing cost-effective, market-based solutions. With the transportation sector contributing the largest portion of greenhouse gas emissions in the United States, both the opportunity for electrification and the challenge of doing so quickly, equitably, and in a manner compatible with the needs of the electric grid are substantial.

Energy Solutions endorses the GoPowerEV solution for ubiquity and equity of EV charging in multi-family parking facilities:

> The majority of EV charging takes place at home. It will be imperative to deploy as much infrastructure as possible that can provide at-home charging sufficient to support a daily commute – less than 40 miles per day for most Californians – while not overloading the grid. With its ability to provide both Level 1 and low-power Level 2 charging to EVs and electric micromobility technologies, GoPowerEV is an ideal solution to support that vision of universal EV charging access.

Peninsula Clean Energy, a Community Choice Aggregation (CCA) program, a public agency, serving San Mateo County with renewable energy, at lower rates, and reinvesting in community decarbonization programs, stated:

> GoPowerEV has an innovative and cost-effective charging solution that aligns with *Peninsula Clean Energy's* right-sizing approach to EV charging. GoPowerEV's software helps EV owners charge their car during hours with cheaper and cleaner electricity. Their approach also helps Peninsula Clean Energy in our mission to achieve 100% renewable energy on an hourly basis.

MidPen Housing Corporation, a 501(c)(3) non-profit, is one of the largest developers, owners and managers of high-quality affordable housing in Northern California. In the 50 years since *MidPen* was founded, *MidPen* has developed over 100 communities and 8,500 homes for low-income families, seniors and special needs individuals throughout Northern California.

MidPen Housing Corporation stated:

> GoPowerEV's charging stations provide EV and eMobility owners living in multi-family residential properties with charging at off-peak electricity rates. It is convenient for the residents who own an EV, as they each park in their assigned spots and plug-in when they need to recharge their EV or eMobility. They can even plug-in every time they park and tell the system to only charge their cars when electricity rates are low! For each charging session, the EV owner can choose the GoPowerEV ECO setting to shift EV charging to off-peak.
>
> GoPowerEV charging stations have the highest reliability and lowest maintenance due to the simplicity and elegance of the PowerPort3. EV and eMobility owners use their own J1772 or portable cord set provided with the vehicle to plug-in their vehicle to the PowerPort3. EV and eMobility owners use their own smartphone to initiate each charge session.

The Board of the *St. Francis Center*, a 501(c)(3) nonprofit in the North Fair Oaks neighborhood of Redwood City, has focused on providing food, clothing and essential services, to the point where the center now owns and operates 263 units across thirteen apartment complexes of extremely low, very low, and low-income apartments for families. The *St. Francis Center* mission is to assure their residents have access to all the necessities for successful modern living in the San Francisco Bay Area; the need for charging electric vehicles at *St. Francis Center* residences **is** one of these necessities. *St. Francis Center* understands that EVs and eMobility devices will be the lowest total cost of transportation for their residents; they are working to make certain that their residents are not left behind the digital divide. This makes EV charging at our facilities vital; and it must be a cost-effective installation and affordable for residents.

The Board of the *St. Francis Center* stated:

> In our opinion, and also that of our advisors, GoPowerEV is the cost-effective, equity solution for extremely low, very low, and low-income multi-family residential properties.

All grants and incentives encouraging EV charging stations in multi-family parking facilities issued by the

California Energy Commission should support the installation of smart Level 1 20 amp 120V (1.9kW) and smart low-power Level 2 20amp 208/240v (3.8kW) ports, without the requirement to have charging cords, at multi-family parking properties.

Sincerely,

Miguel Martinez
Utility SIG Program Manager

Attachments:
GPEV_MultiFamilySolution

The Future is Electric

GOPOWEREV

The most cost-effective, convenient, and scalable hybrid L1 / L2

Charging for Market-Rate and Affordable Multi-Family housing

Promote Equitable Access to EV Charging

Subsidy programs should support smart, power-managed, 20 Amp 208/240v (3.8kW) charging receptacles because they are ideal for multi-family.

Economically Priced For Property Owners

Equitable access helps achieve sustainability mandates

Much lower installation time and cost means every EV owner can get their own charging port in their own parking space. **Helps meet Justice40 initiatives.**

5X

5x the number of stations for a given budget

Lower Cost to Install

At a full installation cost of $2500 to $3500 per space, they are 50% to 80% cheaper to install.

High Up-time

Receptacles are more reliable. No screen or cord to fail.

Convenient

Residents charge in their own spaces, no conflicts. Leave car plugged in when at home.

Low Maintenance

Our unique design allows for easy replacement without an electrician.

Turnkey Solution

Universal

Independent of the charging adaptor (NACS, CCS-J1772, ChaDemo), receptacles can be used for charging all forms of eMobility.

Sustainability

Better for the Grid

Smart, power-managed receptacles can time-shift demand, helping to shed load during peak times. Much lower peaks than super-charging.

GOPOWEREV

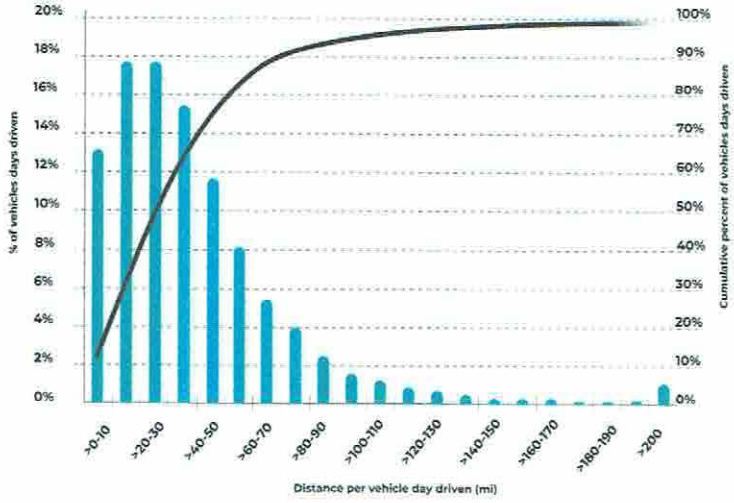
The Future is Electric

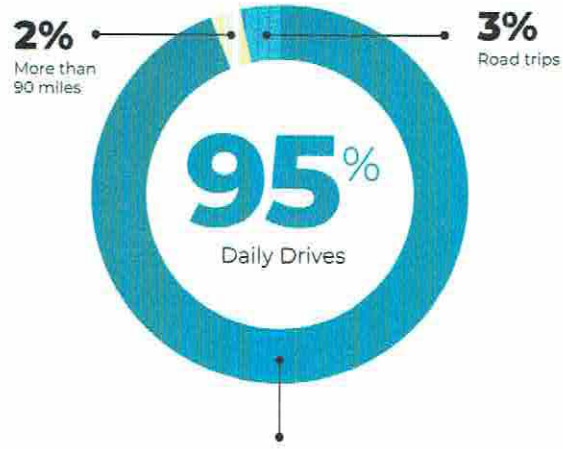
GOPOWEREV

Why is Low-Power (20A) L2 perfect for multi-family?

Lower installation cost means ubiquitous, convenient, in-your-space availability, so residents can leave their car plugged in at home where charging electricity rates are lowest.

Residents can get 150 miles of range in each at-home, overnight charging session.





95% of daily drives are less than 90 miles

Of the drives over 90 miles, most of the time it is a road-trip, and it will be necessary to use en-route or destination charging anyway.

Aligning subsidies and building codes. Maximize access to charging for multi-family residents

California building standards are requiring at least 40% of parking spaces have access to Low-Power L2 (3.8kW) charging receptacles. And agencies are providing subsidies to help multi-family residents

PENINSULA CLEAN ENERGY

Provides $2000 subsidy for each smart L1 or L2 outlet

"This is an exciting technology that has great potential to fill a current gap in the market."

CITY OF BURBANK WATER AND POWER

GOPOWEREV