

**DOCKETED**

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*Comment Received From: Moxion Power  
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## **Moxion Power's Comments on NEVI Funding Program**

See attached letter.

*Additional submitted attachment is included below.*



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March 25, 2024

California Energy Commission  
715 P Street  
Sacramento, CA 95815

Subject: Inclusion of Mobile Battery Energy Storage Systems in the 2<sup>nd</sup> Solicitation under California's National Electric Vehicle Infrastructure (NEVI) Formula Program

Dear California Energy Commission and Caltrans,

On behalf of Moxion Power Co. (Moxion), a leader in mobile battery energy storage (BESS) technology, I am writing to express our support for the expansion and diversification of electric vehicle (EV) charging infrastructure under California's National Electric Vehicle Infrastructure (NEVI) Formula Program. As the state endeavors to meet its ambitious zero-emission vehicle (ZEV) and climate objectives, we believe that mobile charging solutions can significantly contribute to the development of a resilient and comprehensive charging network.

Based on our understanding of NEVI's objectives and the characteristics of EV infrastructure supported by mobile battery systems, we can infer several benefits:

- *Flexibility and Accessibility:* Mobile battery chargers can be deployed to locations with high demand or where permanent infrastructure is yet to be developed. This flexibility ensures that areas temporarily lacking in infrastructure do not hinder the adoption of EVs.
- *Rapid Deployment for Demand Peaks:* Mobile charging units can be quickly deployed to areas experiencing temporary surges in demand, such as during events or in disaster recovery scenarios, supporting the reliability aspect of the NEVI goals.
- *Support for Rural and Underserved Areas:* By deploying mobile charging solutions, the NEVI program can extend its reach to rural and underserved areas faster than waiting for permanent infrastructure. This helps in achieving equitable access to EV charging.
- *Testing and Data Collection:* Mobile units can serve as a pilot to collect usage data and understand charging patterns before installing permanent



infrastructure, ensuring efficient use of resources in line with NEVI's strategic deployment goals.

- *Complement to Permanent Charging Stations:* Mobile batteries can provide additional charging capacity at existing stations during peak times or when permanent stations are undergoing maintenance, ensuring uninterrupted service.
- *Innovative Charging Models:* The use of mobile batteries can introduce new business models and technological solutions, such as battery swapping or mobile on-demand charging, contributing to the innovation goals of NEVI.

Given the essential role that mobile charging solutions play in supporting a broad range of sectors, from freight and fleets to passenger vehicles and beyond, we respectfully request the California Energy Commission to recognize mobile charging infrastructure providers as eligible primary applicants in the upcoming NEVI program solicitation. This acknowledgment will pave the way for innovative solutions that enhance the accessibility and effectiveness of California's EV charging network.

We advocate for the NEVI program to explicitly encompass all forms of charging technology, including mobile chargers. Such an inclusive approach is crucial for leveraging the full spectrum of available technologies to fulfill the state's environmental, transportation, and climate commitments.

The integration of mobile BESS into the NEVI funding eligibility criteria will mark a significant step forward in creating versatile, accessible, and robust EV charging infrastructure across California. Moxion is eager to contribute our expertise and solutions to this program and look forward to the opportunity to collaborate with the California Energy Commission, Caltrans, and other stakeholders in this vital initiative.

Thank you for considering our input. We are committed to supporting California's leadership in electric vehicle infrastructure development and are available for further discussions on how mobile charging solutions can aid in the realization of the state's ambitious goals.

Sincerely,

Alexander Meek  
President  
Moxion Power Co.