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PowerFlex Comments_June 7 Advisory Committee Meeting

Additional submitted attachment is included below.



June 21, 2024

California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, CA 95814

Re: Docket No. 24-ALT-01—PowerFlex Comments on June 7, 2024, Public Meeting of the Advisory Committee for the Clean Transportation Program Investment Plan

California Energy Commissioners and Staff:

PowerFlex appreciates the opportunity to comment on the California Energy Commission's (Commission's) June 7, 2024, Public Meeting of the Advisory Committee for the Clean Transportation Program Investment Plan (Advisory Committee workshop). As a member of the Advisory Committee, PowerFlex appreciates the opportunity to share its expertise and experience in the field and hopes that these comments help inform the Commission's clean transportation investments.

PowerFlex is a leading installer, owner, and operator of distributed energy resources (DERs) including electric vehicle supply equipment (EVSE). PowerFlex has installed more than 10,000 EVSE in California, many of which have been funded through Commission incentive programs and grant solicitations. With this experience and perspective in mind, PowerFlex offers the following comments.

EVSE Incentive Program Compliance

During the Advisory Committee workshop, the Commission discussed EVSE reliability and interoperability requirements that are either currently in place or are being developed for programs, such as uptime, 15118, network roaming, payment methods, and OCPP. PowerFlex strongly supports implementing requirements and measures that will improve customer experiences and interoperability, particularly those that will bring incremental value to customers and companies. However, each requirement imposes costs on charging station operators, and these costs are subsequently passed on to customers. Given this, PowerFlex recommends that the Commission use the following guiding principles when developing these requirements:

- Coordinate across state agencies and clarify which agency (i.e. Energy Commission, Air Resources Board, etc.) oversees which requirements. With the Commission given oversight of payment methods, it is not completely clear which aspects of payment methods the Commission and Air Resources Board oversee.
- Create consistency across programs with requirements. For example, reliability reporting requirements should be the same across individual programs so that EVSE operators are not submitting different types of data sets to each EVSE incentive program.
- Implement only those requirements that create incremental value to customers and that help drive down costs. Given the increased compliance requirements and associated costs across numerous agencies in California, PowerFlex requests that the Commission focus on simplifying requirements and driving down costs.

Funding Allocations



PowerFlex appreciates the Commission's continued support for Light Duty (LD) charging within its EVSE incentive programs. The proposed Investment Plan would allocate over \$650 million to LD programs over the coming years, which PowerFlex strongly supports. In allocating these funds to specific programs, PowerFlex recommends the Commission prioritize the following types of sites and use cases within the programs:

- **Workplace charging.** Workplace charging generally provides the lowest cost to drivers, charging during the lowest greenhouse gas emissions and utility cost hours,¹ and allows for sites to provide load management.
- **Grid services/load management.** Dynamically controlled EVSE has the potential to provide massive cost reductions in the form of avoided and reduced infrastructure buildout. Load management technologies, such as automated load management (ALM), have been reliably used across thousands of EVSE across the state and have already provided substantial cost savings to ratepayers through avoided infrastructure buildout. Pacific Gas and Electric found that sites in its territory using ALM saved between \$30,000 - \$200,000 per site in avoided infrastructure buildout,² and numerous studies forecast the load management technologies, such as ALM, stand to save billions of dollars in the coming years on avoided infrastructure buildout.³ Therefore, PowerFlex recommends that EVSE incentive programs prioritize the use of grid services/load management.
- **Administrative and EVSE compliance consistency across programs.** Administrative time to participate in and comply with each program can be extensive, and PowerFlex therefore asks that administrative requirements, such as process to submit applications, data, or other documents be the same across programs. Additionally, rules around EVSE compliance should be the same across programs to reduce the complexity of EVSE compliance.
- **Open incentive programs.** In PowerFlex's experience, incentive programs that are open on an ongoing basis are generally more successful than those that open for a one-time allocation of funds. When rules and requirements are clearly established and are open for applications, project developers have time to develop more viable projects that are more likely to be installed than when a program has a one-time opportunity to submit applications. PowerFlex believes that programs will see more viable projects created and completed if incentive programs have ample budget, time, and certainty for project developers to submit projects.

PowerFlex appreciates the opportunity to participate in and provide these comments in response to the Commission's June 7, 2024, Advisory Committee workshop and looks forward to collaborating with the Commission on this topic in the future. Respectfully,

Raghav Murali
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¹ *Charging Infrastructure Access and Operation to Reduce the Grid Impacts of Deep Electric Vehicle Adoption*, Nature Energy, September 22, 2022, Page 9. Accessed at <https://www.nature.com/articles/s41560-022-01105-7>

² *Pacific Gas and Electric Company Electric Vehicle Charge 2 Prepared Testimony*, pages 2-9 – 2-10, October 26, 2021.

³ Cal Advocates, *"Distribution Grid Electrification Model Study and Report"* (August 2023).



PowerFlex Inc.