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PowerFlex Comments_Jan Workshop

Additional submitted attachment is included below.

February 4, 2025

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

Re: Docket No. 24-TRAN-03—PowerFlex Comments on January 29, 2025, 2024 Draft Zero-Emission Vehicle Infrastructure Plan Workshop

California Energy Commissioners and Staff:

PowerFlex appreciates the opportunity to comment on the California Energy Commission's (Commission's) January 29, 2025, 2024 Draft Zero-Emission Vehicle Infrastructure Plan Workshop (Workshop). PowerFlex is a leading installer, owner, and operator of distributed energy resources (DERs) including electric vehicle supply equipment (EVSE). PowerFlex has installed more than 13,000 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.

Funding Allocations

At the workshop, the Commission asked whether zero emission vehicle (ZEV) funds should be allocated to level 2 (L2) programs or to direct current fast charging (DCFC) "gas station model" type programs. PowerFlex installs both L2 and DCFC stations, and we therefore appreciate the consideration of both funding approaches. However, PowerFlex strongly urges the Commission to allocate the majority of light duty funds to L2 programs. L2 chargers, especially when installed at sites with long dwell times and daytime charging such as workplaces, hospitals, and multifamily dwellings, have the lowest greenhouse gas emissions, the lowest utility costs, the lowest customer infrastructure costs, and greater opportunities for infrastructure-offsetting load management. Gas station model DCFC sites, however, have a much higher infrastructure cost, fewer opportunities for load management, longer energization timelines, and are much more expensive per port. The EVSE funded by Commission programs will have the lowest environmental and ratepayer costs if they are L2 chargers at sites with long dwell times and daytime charging. PowerFlex believes that EV drivers will benefit more from more L2 chargers available at diverse places rather than DCFC charging hubs.

For these reasons, PowerFlex recommends the Commission prioritize the following types of sites and use cases when allocating ZEV incentive funds:

- **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. Additionally, it provides an opportunity for those who do not have access to charging at home to charge their vehicles.
- **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

[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

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.

- **Open incentive programs/block grants**. In PowerFlex's experience, incentive programs that are open on an ongoing basis and block grants 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 January 29, 2025 Workshop and looks forward to collaborating with the Commission on this topic in the future. Respectfully,

Raghav Murali
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PowerFlex Inc.

[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).