

DOCKETED

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Paired Power Comments on 2025–2026 Clean Transportation Program Investment Plan Guiding Principles

May 16, 2025

California Energy Commission

1516 Ninth Street

Sacramento, CA 95814-5512

VIA DOCKET

Energy Commission Docket 25-ALT-01

Re: Comments for 2025–2026 Investment Plan Update for the Clean Transportation Program: Proposed Guiding Principles

Dear Commissioner Skinner and Energy Commission Staff,

Paired Power is a California-based clean energy technology company delivering resilient, scalable, and solar-powered EV charging solutions. Our products—PairTree[®] and PairFleet[®]—combine solar, battery storage, and smart load management to enable rapid deployment of EV infrastructure without utility interconnection or costly trenching. With over 30 years of combined experience in renewable energy integration, our team is focused on eliminating deployment barriers and enabling affordable, accessible charging across California.

We appreciate the opportunity to submit comments on the Proposed Guiding Principles for the 2025–2026 Clean Transportation Program Investment Plan.

Guiding Principle: Address Infrastructure Barriers and Deployment Delays

Despite record investment, EV charger deployment continues to face bottlenecks—particularly in low-income and underserved communities—due to utility interconnection delays, grid constraints, and high infrastructure costs. Paired Power[™]'s off-grid solar-powered charging solutions bypass these issues entirely, offering:

Zero trenching or utility upgrades

Rapid deployment in weeks, not months

BABA-compliant manufacturing

Eligible for the 30–50% ITC

Our systems reduce demand on the grid, allow for more strategic deployment, and help future-proof California's transportation infrastructure against delays, congestion, and resilience risks.

Guiding Principle: Support Disadvantaged Communities and Rental Properties

We echo the Commission's emphasis on equity. Renters—especially those in multifamily and rural communities—lack access to reliable charging. PairTree, allows charging in tenant parking areas, curbside, or remote lots without disrupting existing building infrastructure.

We urge the Commission to prioritize funding for projects that:

Provide solar-powered EV charging to MUDs and rental properties

Eliminate dependency on utility interconnection timelines

Reduce grid congestion and promote local energy resilience

Offer flexible siting options that don't require rewiring or trenching

Guiding Principle: Accelerate Public and Fleet Charging Access

Fleet electrification is central to state climate goals, especially at public agencies and commercial operators. Yet, grid-tied charging is often infeasible at fleet depots due to transformer or load constraints.

PairFleet, addresses this with:

Integrated solar canopy + battery + software load control

Deployment in less than 60 days

Scalable designs that reduce utility draw by up to 75%

These features help expand access without overloading the grid, support resilience goals, and reduce overall system cost.

Recommendation

We encourage the Commission to:

Create a dedicated category for off-grid and solar-powered EV charging in its investment plan.

Provide bonus scoring for BABA-compliant, ITC-qualified, and rapidly deployable systems.

Incentivize solutions that bypass utility interconnection or do not require utility upgrades,

as these reduce both deployment timelines and long-term strain on the electrical grid.

Prioritize projects that lessen demand on the grid by integrating solar, battery storage, and load management, enabling resilient infrastructure in underserved areas without utility dependency.

Favor technologies that expand charging access without adding grid congestion, especially in rural, multifamily, and fleet electrification projects.

Paired Power is committed to helping California achieve its zero-emission transportation goals. We look forward to continued collaboration and stand ready to support project design and implementation in the public interest.

Sincerely,

Matt Miller
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