

**DOCKETED**

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**Xeal Energy Comments on 2025â€“2026 Investment Plan Update for the Clean Transportation Program**

See attached letter.

*Additional submitted attachment is included below.*



May 21, 2025

California Energy Commission  
Docket No. 25-ALT-01  
715 P Street  
Sacramento, CA 95814

RE: Docket No. 25-ALT-01 - 2025-2026 Investment Plan Update for the Clean Transportation Program Proposed Guiding Principles

Dear California Energy Commissioners and Staff,

Xeal Energy (Xeal) appreciates the opportunity to provide feedback on the 2025-26 Investment Plan Update for the Clean Transportation Plan Proposed Guiding Principles and would like to thank staff for their continued work and leadership in supporting EV charging infrastructure deployment in California.

Xeal has developed the next generation of EV chargers to help address the issue of reliability. Xeal was founded by a group of individuals who were also frustrated with no-charge events and sought solutions to this problem. Xeal's charging infrastructure does not rely on a central point of internet connectivity, which causes most of the charging reliability issues today. Instead, users are provided unique and encrypted tokens that authorize, activate, and transact charging sessions without internet service directly between the charger and phone. All the smart computing is done onsite and during this interaction. This means chargers can operate anywhere – including parking garages and communities with limited internet connection and enable a near 100% uptime and frictionless user experience.

Xeal strongly supports increasing funds for EV infrastructure in multifamily homes, as well as rural and disadvantaged communities, in the *2025-2026 Investment Plan Update*. As SB 1000 analysis shows, not having access to charging at home is one of the most significant barriers to EV adoption. Continued Clean Transportation Program support for EV infrastructure at multi-family residences is crucial to accelerating the deployment of zero-emission vehicles.

Xeal appreciates the opportunity to support and provide input on CEC's development of their Clean Transportation Investment Plan, and we look forward to continuing to work with the CEC and other stakeholders to support the deployment, access, and reliability of light-duty charging infrastructure.

Sincerely,

*Michael A. Smith*

Michael A. Smith  
Vice President, Implementation and Partner Strategy