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ARFVTP Investment Plan comments

Re: Comments on the 2017-2018 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program

Dear California Energy Commissioners and Staff,

Thank you for the opportunity to provide comments on the 2017-2018 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP). We applaud the Energy Commission for its commitment to develop and demonstrate advanced transportation technologies and tools to implement the Governorâ€TMs Zero-Emission Vehicle Action Plan and Californiaâ€TMs climate change policies.

Green Commuter is a minority-woman-owned Benefit Corporation, incorporated in the State of California in 2014. Green Commuter has developed an innovative system that utilizes a fleet of 100% zero-emission vehicles (ZEV) to provide a combined service of vanpool, car sharing and/or fleet replacement to maximize efficiency and decrease the cost of commuting. The Green Commuter model utilizes vanpool vehicles as public car share vehicles and/or fleet replacement vehicles during non-commute hours. This integrated, efficient approach reduces costs and increases benefits—including improving zero-emission mobility, reducing emissions, and alleviating traffic.

Mobility services that maximize occupancy and use of the vehicles are ideally suited for electric vehicle technologies. Utilizing the electric vehicles for multiple forms of mobility services – including vanpooling, car sharing and fleet replacement maximizes efficiency and increases the benefits of zero-emission technology. Zero-emission vanpooling, with the combined car sharing/fleet replacement and necessary supporting EVSE infrastructure, provide the opportunity for more Californians to ride in an electric vehicle and help reach the Stateâ€TMs ZEV deployment and air quality goals.

Green Commuter supports \$17M funding for Electric Charging Infrastructure to accelerate zero-emission vehicle deployment to help meet Californiaâ€[™]s air quality and greenhouse gas reduction goals. Our specific comments include:

 $\hat{a} \in \phi$ We strongly support including eligibility to purchase and install charging infrastructure for demonstration PEV car- and ride-sharing services, particularly in disadvantaged and rural communities to improve zero-emission mobility. These services provide zero-emission transportation options for all Californians, rather than being limited to those who have the means to purchase a new vehicle.

 $\hat{a} \in \phi$ We respectfully request expanding eligibility to include level 3 mobile charging stations to allow more EVs to access fast charging and improve zero-emission vehicle scalability. Mobile chargers provide the ability to charge during off-peak periods and utilize the batteries to charge vehicles during peak periods, reducing the strain on the electrical grid and lowering overall costs.

Green Commuter also strongly supports the Emerging Opportunities program and recently submitted comments on the Request for Information for Innovative E-Mobility Services. As an emerging concept in the transportation sector, there is a critical need for investments that create a strong spark to accelerate the deployment of zero-emission vanpooling and car sharing. We respectfully request the Emerging Opportunities program include strategic funding opportunities for Innovative E-Mobility Services to provide zero-emission, low-cost, energy-efficient and practical transportation services for communities across California.

Thank you for the opportunity to provide comments on the 2017-2018 Investment Plan Update for the ARFVTP. We look forward to continuing to work together to accelerate the deployment of zero-emission transportation and charging infrastructure.

Sincerely,

Gustavo Occhiuzzo CEO of Green Commuter Los Angelesbu