

DOCKETED

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Greenlots Comments on CALeVIP Block Grant for Electric Vehicle Charger Incentive Projects

Additional submitted attachment is included below.



April 27, 2018

Docket Number: 17-EVI-01
-Via e-file-

Brian Fauble
California Energy Commission
1516 Ninth Street, MS-6
Sacramento, CA 95814-5512

RE: Comments of Greenlots on the Southern California Incentive Project (SCIP) as part of the California Energy Commission's CALeVIP program

Dear Mr. Fauble,

In regard to the Block Grant for Electric Vehicle Charger Incentive Projects program, Greenlots offers the following comments to augment and clarify verbal comments offered during the California Energy Commission (CEC) Staff Workshop on the Southern California Incentive Project (SCIP) as part of the CALeVIP program held on April 17th, 2018.

Greenlots is a leading provider of grid-focused electric vehicle charging software and services. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America, and is increasingly supporting programs in the workplace and residential Level 2 space. Greenlots' smart charging solutions are built around an open standards-based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic electric vehicle (EV) charging loads. Greenlots works closely with many stakeholders in the SCIP geography, including many municipalities.

Regarding station minimums, for existing sites in Los Angeles and Orange Country, Greenlots believes the threshold should be one (1). For new sites in all geographies, unless funding can be made more attractive, the threshold should also be one (1). Additionally, we believe some flexibility to the 24hr public access requirement should be provided. An example of where such flexibility could be needed is a government fleet facility or other scenario where the public could use the facility during non-business hours, but the chargers would need to be exclusive for or prioritized for fleet charging or other government or business use during business hours. One approach to incorporating such flexibility could be requiring sites to be available to the public for a minimum number of hours each day, month or year. This would give sites hosts some flexibility for different use cases.

Greenlots believes that the open protocol/standard for this program needs to be defined as OCPP 1.6 or 2.0. The applicant's technology provider, or the technology provider if the applicant, should be required to agree to facilitating software network switching via OCPP for the station owner if the station owner requests this, as a condition of eligibility.

With respect to funding levels, Greenlots believes a higher level of funding should be made available for higher power DC fast chargers due to their higher costs of hardware and deployment.

Finally, live application funding limits are reasonable provided there is a rapid, transparent processing of applications. Otherwise, if application processing is slow, live application funding limits may need to be raised.

Greenlots appreciates Staff's and stakeholders' time and efforts invested into this process, and we look forward to continue with the Commission's development of this program.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Thomas Ashley', with a stylized, cursive script.

Thomas Ashley
VP Policy, Greenlots
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