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Envoy Technologies Comments in Response to May 30, 2018 Joint Agency Workshop

Envoy Technologies Inc. (â€œEnvoyâ€) is pleased to provide these comments in response to the May 30, 2018 Joint Agency Workshop on Clean Energy in Low-Income Multifamily Buildings, and Clean Energy in Low-Income Multifamily Buildings Action Plan.

Please reach out to us with any questions or for clarifications regarding our comments.

Thank you.

-Paul D. Hernandez

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Additional submitted attachment is included below.



**To: California Energy Commission
Dockets Office, MS-4
Re: Docket No. 18-IEPR-08
1516 Ninth Street
Sacramento, CA 95814-5512**

**Eugene Lee
Existing Buildings Office
Efficiency Division
Email: Eugene.Lee@energy.ca.gov**

From: Envoy Technologies Inc.

**Re: May 30, 2018 Joint Agency Workshop on Clean Energy in
Low-Income Multifamily Buildings and Clean Energy in Low-Income
Multifamily Buildings Action Plan**

June 13, 2018

Introduction

Envoy Technologies Inc. (“Envoy”) is pleased to provide these comments in response to the May 30, 2018 Joint Agency Workshop on Clean Energy in Low-Income Multifamily Buildings (“Workshop”), and Clean Energy in Low-Income Multifamily Buildings Action Plan (“Plan”). Envoy appreciates that the Energy Commission is entering an iterative process regarding the Plan, strongly supports the inclusion of Electric Vehicle (EV) fleet mobility concepts in the Integrated Energy Policy Report Update (IEPR) proceeding, and provides our comments a) to update stakeholders on Envoy’s recent developments as an EV fleet mobility provider, and b) to provide recommendations regarding the Workshop and Plan.

Section I - Update on Envoy

Envoy is a rapidly-expanding Electric Vehicle (EV) fleet mobility service provider in California, and beyond. Envoy creates closed EV car sharing systems as an amenity in multi-unit buildings, affordable housing, commercial properties, hotels, workplaces, and destination centers. In 2017, Envoy was awarded a grant from the Energy Commission



to focus on EV fleet deployment specifically in disadvantaged communities (DACs) across two regions (Sacramento and Bay Area) and, pursuant to that program, will be deploying approximately 60 EVs in the affordable housing sector.

Today, on June 13, 2018, Electrify America announced that Envoy was selected as one of three recipients of funding to provide shared mobility services in Sacramento, EA's first designated "Green City." Under that program, Envoy will receive funding to deploy 292 EVs and corresponding infrastructure in two phases, with the majority of the deployment in low income and "disadvantaged" communities as defined by CalEnviroScreen 3.0.

The Energy Commission grant, coupled with private EA funding, will allow for Envoy to launch an additional 350+ EVs in Sacramento and the Bay Area by mid-2019. Given its current pipeline, Envoy anticipates that it will launch upwards of eight hundred EVs across California by the end of 2019. Accordingly, Envoy has registered as an opt-in party to the California Air Resources Board's (CARB) Low Carbon Fuel Standard program,¹ and offers this feedback in light of its hands-on experiences in deploying EV fleets in MUDs. Envoy, therefore, considers itself a stakeholder in this Plan.

Section II - Response to Workshop and the Plan

Specific to the transportation electrification sector, Envoy understands that the Plan prioritizes - among other things- the deployment of EVs and EVSE, the leveraging of data and research, and the value of increased outreach, awareness, and access. Envoy is highly supportive of this Plan and these approaches, which complement a wide range of statewide policy initiatives, including the California ZEV Action Plan,² as well as a suite of equity policies embodied in Senate Bill (SB) 1275, SB 1204, and SB 535, as well as Assembly Bill (AB) 197 and AB 1550. Envoy provides the following recommendations that we believe will further enhance the Plan:

- a. **Expand References.** The Plan highlights CARB's Clean Mobility Options for DACs pilot project,³ however, the Plan should also reference to current innovative mobility pilots underway at the Energy Commission. Specifically, the Plan should reference Grant Funding Opportunity (GFO-16-605) Innovative

¹ CARB Low Carbon Fuel Standard Regulation; Website Access: <https://www.arb.ca.gov/fuels/lcfs/lcfs.htm>

² 2016 Zero-Emission Vehicle Action Plan; Website Access: https://www.gov.ca.gov/wp-content/uploads/2017/09/2016_ZEV_Action_Plan.pdf

³ Clean Energy in Low-Income Multifamily Buildings Action Plan Draft, Page B – 6.



Mobility Service Demonstrations with Zero-Emission Vehicles,⁴ and at minimum, GFO-16-605 should be referenced in Appendix C. GFO-16-605 represents one of the key ways that the Energy Commission is implementing current and innovative DAC pilot investments and, as such, Envoy encourages that the Plan provide reference to GFO-16-605.

- b. **Guide the ZEV Investment Commitment.** Envoy strongly supports the priority to “coordinate multifamily building projects with the ZEV Investment Commitment, which includes funding for projects installing zero-emission fueling infrastructure and car-sharing programs to increase access to ZEVs for low-income and DACs.”⁵ In this regard, we suggest that Energy Commission work with stakeholder agencies to ensure that these funds are specifically designated for car-sharing services in MUDs, affordable housing, and in DACs -- as CARB’s decision regarding the Beneficiary Mitigation Plan (BMP) did not specify this prioritization. In addition, while Envoy agrees that CARB, CEC, and CPUC are key agency coordination points, we would recommend extending the agency stakeholder list to include the SGC, which deploys substantial resources in support of DACs and affordable housing, and funds various mobility-related plans and programs. We would also recommend inclusion of the local air districts, which were identified as key stakeholders in the BMP.
- c. **Expand coordination with multifamily housing developers.** Envoy strongly supports efforts to “[e]nsure that IOU light-duty electric vehicle infrastructure program administrators coordinate with multifamily housing developers to target newer buildings that have the capability of supporting EV charging and are consistent with the CALGreen Code.” This initiative will help streamline adoption in MUDs, and create clearer signals for developers regarding EV readiness. To maximize stakeholder engagement with developers and to evaluate their diverse experiences, Envoy would encourage the Energy Commission to consider allowing for expanded representation and input from the building developer community, including on advisory committees that inform this — and similar— MUD plans.
- d. **EV Car-Sharing programs in Affordable Housing.** Envoy strongly supports the priority to “coordinate EV car-sharing programs with new affordable housing

⁴Solicitation GFO-16-605; Notice of Proposed Awards; September 12, 2017; Alternative and Renewable Fuel and Vehicle Technology Program; Innovative Mobility Service Demonstrations with Zero-Emission Vehicles; Website Access: http://www.energy.ca.gov/contracts/GFO-16-605_NOPA.pdf

⁵ Clean Energy in Low-Income Multifamily Buildings Action Plan Draft, Page B-2.



developments with EV charging spaces.”⁶ Notably, this closely aligns with the “Safeguarding California Plan: 2018 Update” which prioritizes the deployment of car sharing at affordable housing developments.⁷ To implement this policy, Envoy encourages the Energy Commission to consider setting a benchmark for deployment of a minimum number of EVs at affordable housing properties, and that additional goals are established to ensure that receive fiscal support from the State should have at least one EV car-sharing program available. These measures would complement a suite of state EV policies, including the recent Executive Order B-48-18, which seeks to prepare the state for 5 million ZEVs, and help expand private investment in ZEV infrastructure, particularly in low income and disadvantaged communities.⁸

- e. **Data.** Envoy supports the goal to “[g]ather data on the multifamily market sector.”⁹ This data will directly inform policy on electrification and transit. We would advocate for uniform data collection practices and recommend that the Energy Commission request data collection from car-sharing providers in alignment with CPUC Senate Bill 350 Transportation Electrification Reporting Requirements,¹⁰ which has created a framework for EV data gathering. Leveraging this existing resource (which has already been vetted through the regulatory process) will maximize the use of existing public resources while promoting consistent data gathering practices across sister agencies.
- f. **Evaluation, measurement, and verification (EM&V).** We applaud the priority placed on collecting best practices and lessons learned for program success in the multifamily sector.¹¹ Specific to EV car sharing and fleets, Envoy encourages collection of user data, trip location, driving habits, and other characteristics which inform this EM&V for the car-sharing sector. Such data collection should measure, and not be limited to, the following:
 - o Vehicle location tracking (*where do we need these vehicles to go?*);

⁶ Clean Energy in Low-Income Multifamily Buildings Action Plan Draft, Page 16.

⁷ Safeguarding California Plan: 2018 Update; California’s Climate Adaptation Strategy | January 2018; Page 39; Website Access:

<http://resources.ca.gov/docs/climate/safeguarding/update2018/safeguarding-california-plan-2018-update.pdf>

⁸ Executive Order B-48-18; Website Access:

<https://www.gov.ca.gov/2018/01/26/governor-brown-takes-action-to-increase-zero-emission-vehicles-fund-new-climate-investments/>

⁹ Clean Energy in Low-Income Multifamily Buildings Action Plan Draft, Page 30.

¹⁰ D.18-01-024 establishes utility data collection and reporting requirements for SDG&E, SCE and PG&E’s priority review projects. CPUC Website Access: <http://www.cpuc.ca.gov/sb350te/>

¹¹ Clean Energy in Low-Income Multifamily Buildings Action Plan Draft, Page B-6.



- o Vehicle telematics measures (*what types of obstacles do these vehicles face?*);
 - o Live battery levels, in kWhs (*what is the real-world use cases for these vehicles in terms of energy consumption?*);
 - o Speed of vehicles (*how is this fleet treated? What types of operational and maintenance patterns can we deduce?*);
 - o Driving habit calculations (*what types of common occurrences will our EV fleet models need to take into account?*);
 - o Accident and Crash data (how often do these EV fleets have these events?);
 - o Plug-in status and utilization (*what are the true charging patterns for these fleets?*); and
 - o Live odometer and speedometer readings (*what can we learn from live EV fleet data?*).
- g. **California Capital Access Program (CalCAP).** Envoy supports the prioritization to coordinate EV charging infrastructure programs with the CalCAP to determine funding potential and implementation pathways.¹² However, recognizing that the policy climate has evolved to include “one-stop shop” pilot approaches,¹³ Envoy would encourage the Energy Commission to explore the use of CalCAP funds for some or all of the following:
- o pilot programs that target specific DACs for EV car sharing programs;
 - o research and development pilot focused on data gathering for EV car-sharing programs in multi-unit dwellings; and
 - o marketing, education, and outreach campaigns focused on exposing affordable housing, MUD, and DACs residents to car-sharing and other shared mobility services.

By streamlining program access to multiple resources, the Energy Commission will be able to maximize benefits to affordable housing and DAC residents.

¹² *Clean Energy in Low-Income Multifamily Buildings Action Plan Draft, Page 26.*

¹³ *For example, CARB has developed a One-Stop Shop Program to specifically provide coordinated community- and issue-based outreach and education to increase low-income consumer participation across all of CARB's Low Carbon Transportation Equity Projects; Public Workshop Notice: https://www.arb.ca.gov/msprog/aqip/meetings/oss_wg_handout.pdf*



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Conclusion

Envoy appreciates the opportunity to provide these comments in response to the May 30, 2018 Joint Agency Workshop on Clean Energy in Low-Income Multifamily Buildings, and Clean Energy in Low-Income Multifamily Buildings Action Plan, and stands in strong support of this initiative. Please reach out to us with any questions or for clarifications regarding our comments.

Sincerely,

Aric Ohana
Envoy Technologies Inc.