

DOCKETED	
Docket Number:	19-TRAN-02
Project Title:	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
TN #:	232767
Document Title:	Greenlots Comments - Greenlots CEC MDHD Block Grant Concept Comments
Description:	N/A
Filer:	System
Organization:	Greenlots
Submitter Role:	Public
Submission Date:	4/16/2020 4:52:43 PM
Docketed Date:	4/16/2020

*Comment Received From: Greenlots
Submitted On: 4/16/2020
Docket Number: 19-TRAN-02*

Greenlots CEC MDHD Block Grant Concept Comments

Additional submitted attachment is included below.



April 16, 2020

Docket No. 19-TRAN-02
-Via e-file-

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Comments of Greenlots on Block Grant for Medium- and Heavy-Duty Zero-Emission Vehicle Infrastructure Incentive Projects Draft Solicitation Concept

Greenlots submits these comments to the California Energy Commission (CEC or the Commission) in response to its Draft Solicitation Concept on a Block Grant for Medium- and Heavy-Duty (MD/HD) Zero-Emission Vehicle Infrastructure Incentive Projects following its April 2, 2020 workshop where the concept was presented.

Greenlots is a leading provider of electric vehicle (EV) charging software and services committed to accelerating transportation electrification across California, and a wholly-owned subsidiary of Shell New Energies. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America, and a growing amount of Level 2 charging infrastructure. 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 charging loads and respond to local and system conditions.

California has set pivotal goals for reducing emissions with 50% renewable energy generation and deploying at least five million zero-emission vehicles (ZEVs) by 2030, as well as deploying 250,000 charging stations, including 10,000 Direct Current (DC) fast charging stations by 2025. While much more needs to be done, Greenlots applauds the state's and CEC's leadership in making progress and developing programs aimed at achieving these and related goals, and looks forward to continued development and execution of further goals.

Below Greenlots wishes to highlight two areas where this draft solicitation concept appears to have room for clarification and/or improvement:

- Ensure a sufficiently robust stakeholder process is utilized in the development of the ultimate block grant program, with sufficient CEC direction and oversight. In reviewing the concept and from the slides and presentation at the workshop, it wasn't entirely clear what happens once the block grant is awarded to the "not-for-profit technology entity" with respect to stakeholder engagement and comment on the design of the actual programs/projects to be administered by the 3rd party. It also didn't seem entirely clear who will take lead in developing the specific funding opportunities with respect to program design, segment prioritization, sub-budget specification, etc., whether that be CEC staff as is the case with CALeVIP, or perhaps if this is to be delegated to the TBD 3rd

party. Greenlots would express concern if the plan indeed is to delegate this important work and decision-making to a yet-to-be determined 3rd party. Greenlots believes that while the program administration should be done by the 3rd party as envisioned, the actual program design likely should not be. This would also maintain consistency with the division of responsibilities used in CALeVIP. In either case, a sufficiently robust stakeholder engagement and feedback process is necessary to inform the ultimate program design.

- Program design should center around incentivizing higher-quality projects and technologies. Given that demand for this program almost assuredly will far exceed the current \$50M budget allocation, while it is important to look to ways to secure additional, continued funding, it is also important to make sure that the funds allotted go the furthest in achieving the state's goals. To do this, the program design should reward project quality, and not be designed in the same image as CALeVIP, which has suffered from rapid oversubscription and rapid exhaustion or assignment of funds, sometimes to immature projects that lack a clear path to completion. While speed and access to financing are valuable program elements, this must be balanced against support and incentives for applicants to shop around for solutions that are of the greatest value or best fit their needs, and not just incentivize finding solutions they can most easily or quickly identify. Additionally, it is important for projects to demonstrate they are well-conceived and "real" before they receive a funding reservation at the expense of other projects. Additionally, the Commission should have an eye towards introducing more competitive elements into such programs to make state funding go further, which also provides an incentive for higher quality products and services. Greenlots looks forward to exploring these program design considerations with the Commission and stakeholders further at a later date as those details are worked out.

Greenlots appreciates the Commission's consideration of these comments, and its ongoing efforts to support transportation electrification and advanced mobility.

Sincerely,

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

Thomas Ashley
VP Policy, Greenlots
tom@greenlots.com