

**DOCKETED**

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**13 May 2020 testimony of Princeton Energy to CEC Docket No 20-FINANCE-01**

*Additional submitted attachment is included below.*

# Princeton Energy LLC

*Innovation in Renewable Energy*

13 May 2020

California Energy Commission  
Docket Unit MS-4  
Re: Docket No. 20-FINANCE-01  
1516 9th Street  
Sacramento, CA 95815

Re: Strategies to Attract Private Investment in Zero Emission Vehicle Charging Infrastructure and Other Clean Transportation Projects

Dear California Energy Commission Staff:

Princeton Energy LLC (Princeton Energy) respectfully provides the following comments in response to the California Energy Commission's (CEC or Commission) Request for Information (RFI) in Docket 20-FINANCE-01, Strategies to Attract Private Investment in Zero Emission Vehicle Charging Infrastructure and Other Clean Transportation Projects.

Background: CEC programs to promote energy efficiency in local public facilities. Local public jurisdictions (cities, counties, school districts, community colleges, transit agencies, irrigation districts, etc.) in California have in the past had difficulty achieving optimum energy efficiency in their facilities because of several factors, including:

- Lack of specialized expertise, both in technical analysis of energy use and in procurement of energy efficiency products and services, especially in smaller jurisdictions.
- Constrained capital budgets.

To address this problem, the Commission has for many years offered assistance to local public jurisdictions through several programs, including:

- The Energy Partners Program and the Bright Schools Program, which provide financial support to local jurisdictions in contracting for and completing an audit of the jurisdiction's facilities to identify energy efficiency measures and analyze their cost-effectiveness.

- The Energy Conservation Assistance Act, which provides low-interest loans to local public jurisdictions to implement the energy efficiency measures identified in the audit. Proposition 39 in particular has provided funds for school districts and community colleges.

These programs have been very successful, resulting in substantial OpEx savings for California cities, counties, school districts, community colleges, and other agencies.

Proposal to expand the CEC's support of local public jurisdiction to include transportation electrification (TE). Many local public agencies operate large vehicle fleets. Assisting these agencies achieve transportation electrification is consonant with the CEC's mission and expertise, for the following reasons:

- TE provides for substantial energy efficiency gains (one of the CEC's core missions), because of the greater energy efficiency of electric drive trains. (This is in addition to substantial reductions in carbon emissions).
- Planning for vehicle fleet electrification is in many ways analogous to facility energy audits, requiring a similar process of evaluating CapEx, OpEx impacts, service life of capital assets, cost of money, and overall cost-effectiveness.<sup>1</sup> The CEC has been doing this very well for decades.
- Local public agencies may have difficulty planning for vehicle fleet electrification with their own staff resources and can benefit from specialized expertise at the CEC.
- Local public agencies may be capital-constrained. At the same time, vehicle fleet electrification lends itself to an ESCo-type financing arrangement and often qualifies for financial support from USDOT and state funds.

We propose that the CEC expand the Energy Partners and Bright Schools Programs specifically to provide the same support for vehicle fleet electrification planning as they currently do for facility energy efficiency planning. We believe that the same budget (\$20,000 per agency) should be sufficient to accomplish a first-phase study and analysis, enabling the local agency to make informed decisions about TE, procurement options, EV charging infrastructure, etc. Just as the Energy Partners and Bright Schools Programs have been big successes and achieved win-win-win outcomes, so will the proposed expansion of the programs to cover vehicle fleet electrification.

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<sup>1</sup> One significant difference between facility energy efficiency audits and vehicle fleet electrification planning is that buildings tend to be one-off creations, so energy efficiency audits must be bespoke, whereas electric vehicles are manufactured products with predictable costs. As a result, planning for vehicle fleet electrification is amenable to somewhat standardized analyses. At least one major service provider is developing an automated platform to assist fleet operators with vehicle fleet electrification planning.

Thank you very much. Princeton Energy appreciates the opportunity to provide these comments and commends the CEC for taking this initiative.

Sincerely,

Steve Taber <sup>2</sup>  
Chairman and CEO  
Princeton Energy Companies

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<sup>2</sup> Disclosure: The signer is an advisor to Enel X North America and was the primary author of Enel X NA's comments to this docket.