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Electriphi Comments - BESTFIT Innovative Charging Solutions

Additional submitted attachment is included below.



California Energy Commission Re: Docket No: 19-TRAN-02 1516 Ninth Street Sacramento, CA 95814

RE: Draft Concept Document BESTFIT

Dear Energy Commission Staff,

Thank you for continuing to promote and sponsor clean technology initiatives for medium and heavy-duty vehicles. Now, more than ever, funding for clean propulsion technology needs to be allocated towards impactful projects, with a high probability of success.

Please consider the following comments in advance of releasing the full program solicitation.

- 1. A minimum charger utilization target should be defined. Or, alternatively, a minimum percentage increase for charger energy throughput should be defined. In either scenario, defining this will ensure more beneficial applications are received.
- 2. The data submission requirement interval should be defined as monthly. This allows for better ongoing oversite and administration. Additionally, as funding continues to be allocated and awarded, data throughput is essential for making data driven decisions around the value and impact of project teams, companies and individuals involved; as well as the viability of the technology itself.
- 3. By the very nature of the efficiency and duty cycle of medium and heavy-duty vehicles, the amount greenhouse gas reduction and energy savings far exceed that of light duty vehicles. As a result of COVID-19, The state of CA will see a reduction of passenger cars being driven on the road, and considering unemployment is at a historic all-time high, it is very likely that consumer spending for passenger EVs will be reduced. For this reason, we suggest reducing the cap on light duty vehicle sector to \$2.5M and increasing the cap on medium/heavy duty to \$5M. Further to this point, if program funding is increased or decreased then the priority should be placed with heavy/medium duty vehicles to maintain or increase the available allocations.

Cheers,

Joel Torr

Head of BD & Partnerships

Electriphi Inc