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California Energy Commission Recovery and Reinvestment Initiative

Additional submitted attachment is included below.



May 3, 2021

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

VIA DOCKET
Energy Commission Docket 21-TRAN-02

Re: 21-TRAN-02, California Energy Commission Recovery and Reinvestment Initiative

Dear Commissioners:

On behalf of FreeWire Technologies, thank you in advance for considering our comments with respect to the California Energy Commission (“CEC”) Recovery and Reinvestment Initiative. FreeWire appreciates the CEC’s continued support of transportation electrification, manufacturing capacity, and workforce development across the state and offers these comments to convey our strong support of the Initiative. Specifically, we are writing to propose a targeted investment in rapidly deployable battery-integrated DC fast charging stations across California’s underdeveloped and underserved communities to support resiliency, equitable access to electrification technologies, job creation, and economic development.

Our recommendations are intended to increase certainty and facilitate faster distribution of capital for direct current fast charging (“DCFC”) projects to help the state meet its aggressive electrification goals while supporting the state’s economic recovery from COVID-19. There are numerous EVSE original equipment manufacturers, suppliers, vendors, and integrators in California that, like many other industries, have been substantially impacted by COVID-19. Still, there remain significant disparities in access to reliable, resilient DCFC, particularly in rural areas and underserved communities. Targeted investment into rapidly deployable battery-integrated EVSE with a preference for in-state manufacturers would provide the multifaceted benefits sought of the Recovery and Reinvestment Initiative by generating additional demand for domestic manufacturing, job creation, and economic development. Battery-integrated EVSE provides ongoing benefits to operators and California by providing resiliency during grid instability, emergencies, and natural disasters; by mitigating higher costs of delivered electricity and demand chargers; and, by enabling greater utilization of renewable energy as a transportation fuel. Low-cost, rapidly deployable battery-integrated EVSE solutions provide an excellent opportunity to accelerate clean transportation growth across California, particularly in transmission-constrained and wildfire-prone areas.



About FreeWire

FreeWire, with a mission to accelerate electrification at the grid edge, is a certified California Small Business that is manufacturing EVSE hardware in San Leandro, a disadvantaged community (DAC). We believe that the incorporation of energy storage with EVSE is fundamental to ensuring a more cost-effective, streamlined, and geographically diverse buildout of EV charging infrastructure. Our Boost Charger demonstrates the potential to deploy DCFC in weeks rather than months at just about any site location. Make ready infrastructure costs for a Boost Charger are a fraction of a typical DCFC project due to the ability to utilize low input power for high power DCFC output. In addition, installations are less complex and costs are lower because often no new grid infrastructure is needed. Similarly, ongoing operational costs are reduced due to the integrated battery buffer that protects utilities and asset owners from higher energy costs in the form of capacity requirements, demand charges, and peak pricing. FreeWire has actively engaged with a diversity of organizations, agencies, and programs across the state and is confident there is significant interest in the rapid deployment of EVSE minimizing the need for facility and grid infrastructure upgrades.

Deploy EVSE as Rapidly as Possible

To avoid delays related to building infrastructure and transformer upgrades that can be required to accommodate EV charging, we propose offering providers the option to incorporate flexible charging infrastructure technologies that reduce or even eliminate the need for these grid upgrades entirely. These include storage-integrated EV charging products from companies like ours and many others, designed from the ground up for rapid deployment, as well as load-managed EV charging products designed for use with existing multifamily electrical infrastructure. This approach would unlock quick investments for charging infrastructure with targeted investments across the state into communities hardest hit by COVID-19. These projects will also serve as powerful case studies of innovative strategies to unlock EV charging in critical sectors and help guide future investments.

Targeted investments in rapid deployment of EVSE can leverage the substantial growth of private and utility investment into these technologies and receive up to \$30,000 from the federal EVSE tax credit. Additionally, there are numerous federal, state, and local incentive programs, such as the Carl Moyer Memorial Air Quality Standards Attainment (Carl Moyer) Program and the California Electric Vehicle Infrastructure Project (CALeVIP), that would provide opportunity to maximize each Initiative dollar invested by the CEC while deploying these technologies into those industries and communities among the hardest or slowest to decarbonize.

Measuring Success of the Initiative

One key to a successful recovery effort is ensuring funding is deployed quickly yet with adequate oversight to ensure promised benefits are delivered to those communities most in need. Benefits delivered under a recovery initiative should be tracked for both



near-term and long-term outcomes. Near-term metrics for project success could include the speed of delivery and commissioning new DCFC charging ports, ability to fill existing gaps in reliable access to resilient DCFC, alignment with known community and stakeholder needs, total leveraged investment from both private and public sources, and the ability to generate both permanent and temporary jobs within 6- and 12-month horizons. Long-term metrics should be regularly evaluated and measured over a period of at least three years to better assess the impact of Recovery and Reinvestment Initiative funding. These long-term metrics for project success could include utilization and performance data for the deployed EVSE; evaluation of EVSE's ongoing benefits and impacts to the grid; growth of EV adoption in nearby communities and industries; follow-on funding secured by domestic EVSE manufacturers; and, data on permanent jobs generated and retained.

Conclusion

FreeWire appreciates the challenges of implementing complex programs, particularly in times of severe hardship. We strongly believe that investment into rapidly deployable EVSE that is manufactured here in California will drive many of the benefits needed in this time of recovery. We look forward to the opportunity to support the Commission's Recovery and Reinvestment Initiative and provide greater, more equitable access to clean transportation infrastructure, technologies, and careers.

Ethan Sprague
VP of Sales