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BEAM Comments on the ZIP

Additional submitted attachment is included below.



California Energy Commission
Dockets Office
1516 9th Street
Sacramento, CA 95814

RE: 2022 Statewide ZEV Infrastructure Plan; Docket #21-TRAN-03

BEAM is pleased to provide comments to the California Energy Commission's (CEC) 2022 Statewide ZEV Infrastructure Plan (ZIP). We thank the CEC for holding the preliminary ZIP workshop and developing a thoughtful draft outline for discussion and stakeholder input. We are supportive of the draft outline and look forward to engaging throughout the drafting process.

BEAM designs, manufactures, and sells sustainable EV charging infrastructure solutions that serve dual functions as emergency preparedness equipment and energy resiliency assets. BEAM systems are Made-in-America products that are manufactured in California. The flagship EV ARC™ charging system is 100% renewable, movable, grid independent, and it fits in a standard parking space. It requires no electrical work, no construction, and can be deployed in minutes.

During the January 20th workshop, many of the public comments were centered around the need for resiliency and to ensure the continuity of the state's charging network, and we echo the same sentiment. With the ZIP also focusing on "grid-readiness", it is a step in the right direction, but more needs to be done to ensure to continuity of the state's charging network in event of grid disruptions from natural disasters, cybersecurity threats, and PSPS events.

CEC has done great job at incentivizing traditional grid-tied EV charging projects across the state, but there has been a lack of funding opportunities for other non-conventional EV charging projects. The physical, cybersecurity, and PSPS vulnerabilities to the grid are too great to ignore. We need investments and research into how we can ensure the continuity of our charging network.

The CEC should consider creating a market segment for funding opportunities for other non-conventional charging types including, but not limited to: off-grid, all-inclusive solar EV charging, portable, battery storage, and other emerging technologies.

As the federal government looks to make transformative investments in EV infrastructure, the Government Services Administration (GSA) started to evaluate how they would address EVSE in a draft RFQ released in July 2021. In their respective breakdown of EVSE they list L1, L2, and DCFC as typically seen in industry, but they expand on that to include off-grid/solar and portable chargers. We believe the CEC needs to start viewing off-grid in the same light and make sure programs provide incentives that reflect the true cost of the technologies.



We are pleased to see the “emerging technology” category in the market segment break down and we see this a pathway to creating a market segment for off-grid and resilient charging solutions as outlined above. Knowing that the ZIP will support the ZEV Market Development Strategy that addresses the state’s infrastructure needs, we urge the CEC to include this critical market segment in the development of the ZIP.

BEAM appreciates the opportunity to provide comments on the ZIP and thanks the CEC for its ongoing work to advance the deployment of transportation electrification. Please reach out if you have any questions.

Thanks,

Brad Groters

brad.groters@beamforall.com

(202) 394-2804