

DOCKETED	
Docket Number:	22-EVI-05
Project Title:	National Electric Vehicle Infrastructure (NEVI) Funding Program
TN #:	255262
Document Title:	Xeal Energy Comments - Xeal Energy Comments on NEVI Funding Program
Description:	N/A
Filer:	System
Organization:	Xeal Energy
Submitter Role:	Public
Submission Date:	3/25/2024 4:48:19 PM
Docketed Date:	3/25/2024

Comment Received From: Xeal Energy
Submitted On: 3/25/2024
Docket Number: 22-EVI-05

Xeal Energy Comments on NEVI Funding Program

See attached letter.

Additional submitted attachment is included below.



March 25, 2024

California Energy Commission
715 P Street
Sacramento, CA 95814

RE: 22-EVI-05 NEVI, National Electric Vehicle Infrastructure Funding Program

Dear California Energy Commission,

Xeal Energy appreciates the opportunity to provide feedback on the first California National Electric Vehicle Infrastructure (NEVI) grant funding opportunity (GFO-23-601), and on the proposed second NEVI grant funding opportunity. Xeal appreciates the Energy Commission's efforts to leverage federal funding to support the build-out of a network of modern and reliable charging infrastructure.

Xeal offers multifamily and commercial real estate owners and operators the ability to seamlessly install smart EV charging in their communities. Clients manage these smart EV charging stations remotely through Xeal's dashboard, providing real-time data on charging sessions, energy management, utilization, and revenue share. Xeal's driver app employs a token-based technology for EV drivers to gain reliable access to charging stations without relying on cellular or garage IT infrastructure. Through Apollo, a groundbreaking decentralized communication protocol, building owners can remotely control and monitor smart charging stations through a bi-directional management channel between user smartphones and EV chargers to establish a more secure, reliable, and cost-effective way to stay connected. Xeal delivers an entirely self-sufficient smart charging experience for drivers, enabling near 100% uptime, 50x faster-processing speed, and a frictionless user experience.

To help accelerate the deployment of zero-emission vehicles in disadvantaged and low-income communities, there is a significant need to increase investments supporting level 2 charging infrastructure. We request the CEC include NEVI Formula Program funds to build not just DCFC but also level 2 infrastructure in the next solicitation and future solicitations. Level 2 provides reliable, lower cost infrastructure upgrades than DCFC as it does not require as much power supply and can therefore be deployed faster and more abundantly. We are glad to see the NEVI funds include uptime reliability to improve California drivers experience with chargers which will increase EV confidence and adoption. However, the requirement to include traditional networked chargers that rely on a constant internet network jeopardizes reliability as that is the most likely cause of non-charge events. We request the CEC include next-generation EV charging infrastructure technology, that can include network solutions outside of Open Charge Point Protocol (OCPP) and Open Charge point Interface (OCPI) that can leverage a host of other communication systems like Bluetooth and NFC. , Xeal employs a unique token-based technology for EV drivers to experience reliable access to charging stations without relying on on 3rd party Internet Service Providers (ISPs) that creates a central point of failure. Allowing for more options within the network definition will create more driver confidence and reliability for this essential fuel infrastructure.

Xeal appreciates the opportunity to provide input on the second California NEVI grant funding opportunity and urges the CEC to include eligibility for level 2 charging infrastructure. We look forward to continuing to work with the CEC and other stakeholders to support the deployment, access, and reliability of light-duty charging infrastructure.

Sincerely,

Michael A. Smith
Head of Deployments and Policy
Xeal Energy