

**DOCKETED**

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**RE: Draft 2020 Integrated Energy Policy Report Update, Volume 1; Docket #20-IEPR-01**

BEAM is pleased to provide comments to the California Energy Commission (CEC) Draft 2020 Integrated Energy Policy Report (IEPR) Update, Volume 1. We thank the CEC staff for its time, thoughtful consideration, and recommendations in the report.

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 the only 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.

BEAM supports the “avoided cost of charging” concept, alliteratively referred to as Transportation Electrification Regulatory Policies Act (TERPA) in past CEC workshops (pages 95-96). This approach creates an equitable funding solution that does not favor one business model over another, which will establish fair competition amongst EVSPs.

BEAM strongly supports the following recommendation from the Report:

- **The CEC should work with state and local planners to identify strategic ZEV charging and refueling opportunities that are resilient to power outages and natural disasters.** More planning is needed to ensure that charging and refueling are available during emergency situations for all drivers, especially those in disadvantaged and low-income communities (page 126).

Building on this recommendation, we urge the CEC to provide funding support for off-grid charging infrastructure. While there are many great funding opportunities for grid-tied charging infrastructure, there is nothing available for off-grid solutions.

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

Thanks,

Brad Groters