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January 27, 2021

Ms. Patricia Monahan, Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re : FLO Comments on the CEC's Draft Integrated Energy Policy Report

Dear Commissioner Monahan,

Thank for the opportunity to comment on the Energy Commission's (CEC) draft Integrated Energy Policy Report (IEPR).

FLO is a leading North American charging network for electric vehicles (EV) and a major provider of smart charging software and equipment. FLO offers public, commercial, and residential chargers, including Level 2 EV supply equipment (EVSE) and DC fast chargers (DCFC). In North America, FLO has deployed over 35,000 charging stations and manages approximately 500,000 unique charging experiences that transfers 5.5 GWH of energy monthly. FLO's headquarters and network operations are based in Québec City.

We offer the following comments for the CEC's consideration:

1. FLO supports the CEC's continued focus on equity and would encourage more information sharing in this area.

FLO supports increasing low-income and disadvantaged communities' ability to access the benefits of EVs and charging. If California intends to move beyond an "early adopters" phase of EV deployment to make EVs more mainstream, it will need to maintain its focus on helping Californians of all income levels access this technology while simultaneously helping the industry build economies of scale and bring overall costs down.

"Equity" can ultimately mean different things to different groups, and certainly low-income and disadvantaged communities are not a monolith when it comes to their barriers to accessing EVs and charging. FLO respectfully encourages the CEC to facilitate meetings, workshops, and other types of information sharing between equity groups, community-based groups, utilities, and electric vehicle service providers to encourage a shared understanding of these communities' needs and how to address these issues together.

2. FLO supports the CEC's focus on reducing "soft costs" for electric vehicle service providers.

FLO agrees that "soft costs" for electric vehicle service providers are a real issue that unnecessarily slow charging deployment. Soft costs take shape in many forms, some of the most challenging of which are unclear permitting and utility interconnection timelines. FLO respectfully encourages the CEC to encourage developing tools and solutions that provide technical support to cities and utilities alike to help with these processes. This could come in the form of an online portal that offers standardized forms and tools to streamline these processes.

This is an especially acute issue for both smaller and rural cities that lack staffing and technical capacity to expedite permitting for charging stations.

3. FLO supports the CEC demonstrating new funding mechanisms that maximize the value of charging while reducing overall costs.

FLO supports the CEC's investigation of piloting new funding mechanisms to maximize the deployment of chargers while reducing overall costs. Focusing on this metric as a type of "target" creates incentive for companies to continue prioritizing innovation and competition in the marketplace, which will only further serve the state's goals to bring costs down for charging.

Given the complexities of operationalizing this "target" through various funding mechanisms, FLO also respectfully encourages the CEC to hold technical workshops to explain the design of these mechanisms, showcase examples of how they work, and provide support to electric vehicle service providers to ensure they understand how to participate in them.

4. Ratebasing distribution upgrades can increase the scale and pace of charging deployment when paired with the goal to reduce overall costs of electrification.

Governor Newsom's executive order to phase out the sale of gas cars by 2035 creates a renewed imperative for government, utilities, and industry to exponentially increase their focus on deploying chargers. This endeavor should include both reducing regulatory hurdles and financial barriers – while we agree that the financial tools the CEC wants to pilot could prove valuable to leveraging private investment in charging, we support the use of additional financial tools – such as utilities' ratebasing distribution system upgrades – to rapidly increase the scale and pace of charging deployment. We do not believe the utilities' ability to do this, codified with AB 841 (Ting, 2020), has immediate negative consequences for charging, but rather will remove an important financial hurdle for customers who want to invest in charging. This tool should also be aligned to the extent feasible with the CEC's goal to maximize charging at the lowest overall societal cost of deploying stations.

Thank you for your consideration,

[Electronically submitted]

Cory Bullis
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