

DOCKETED

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California Energy Commission
1516 Ninth Street Sacramento
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Submitted via email to: docket@energy.ca.gov

Re: Adding AI-based Smart Charging to CEC Docket: 20-IEPR-01

Dear Commissioners,

MOEV, an AI-based smart charging infrastructure supplier, appreciates the opportunity to comment to you about CEC IEPR Update, Volume 1. To advance the policy initiatives of the CEC referenced in the document most effectively, MOEV will focus on a single improvement that we believe could be made to it. We noted that the only mention of artificial intelligence is on page 59 and is in regard to the ride-hailing and logistics ZEV space “where operations provide a good opportunity for the use of artificial intelligence.”

MOEV suggests that charging infrastructure pages 76-102 (“Smart integration of charging infrastructure into the grid”) could be improved by addition of references to the benefits AI-based infrastructure will offer in charging management to achieve the lowest possible energy charges while still fulfilling all EV charging requests. We believe AI will also be a great help in grid impact mitigation. Additionally, we have shown that AI will maximize use of integrated renewable generation/distributed energy resources (DERs).

Per HEVI-PRO modeling, charging load and use cases differ dramatically depending on region. This is another reason why artificial intelligence informed EV charging infrastructure solutions are needed ubiquitously and thus ought to be included.

Where the CEC mentions ZEVs as a source for resiliency on pages 119-127 (“Resiliency solutions especially for fleets”), we again think the document could be strengthened by mention of DER-integrated, AI-informed smart charging.

Finally, with regard to the Medium-Duty/Heavy Duty (MDHD) EV fleet charging section, the same statement we initially noted was made by the CEC on page 59 for ride-hailing and logistics ZEV space, ought to also be considered for inclusion.

Sincerely,

The MOEV team

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