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January 27, 2021

Docket No. 20-IEPR-01

-Via e-file-

California Energy Commission  
Docket Unit, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

RE: Greenlots' Comments on Draft 2020 IEPR Update, Volume 1: "Blue Skies, Clean Transportation"

Dear Commissioners and Staff,

Greenlots submits these comments in response to the California Energy Commission's ("CEC" or "the Commission") Draft 2020 Integrated Energy Policy Report ("IEPR") Update, Volume 1 on California's transportation future and the transition to zero-emission vehicles.

Greenlots is a leading provider of electric vehicle ("EV") charging software and services committed to accelerating transportation electrification in California, and a wholly owned subsidiary of Shell New Energies. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America, and an increasing amount of Level 2 infrastructure. Greenlots' smart charging solutions are built around an open standards-based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic EV charging loads and respond to local and system conditions.

Greenlots commends the Commission and its staff for identifying clean and advanced transportation as a critical topic for this 2020 update to the IEPR. The report details key issues in California's road ahead in advancing and meeting its clean transportation goals. Greenlots appreciated participating in the workshops held informing and leading up to the publication of the draft report, and for the past opportunity to comment on many of the important issues discussed (see "Greenlots' Post Workshop Comments on VGI Integration and Charging Infrastructure Funding" filed in Docket No. 20-IEPR-02 on July 17, 2020).

Below Greenlots provides select comments on several sections and issues raised in the draft report.

**The report's focus on equity is appropriate, and should emphasize the unique barriers to rural transportation electrification**

Greenlots sees opportunity to strengthen the discussion on transportation electrification equity issues and challenges by detailing some of the unique barriers faced by certain communities, and the strategies and approaches that may be necessary to address them. While there has been

significant focus in California on equity issues pertaining to more urban areas, a focus on those issues as they relate to California's rural communities is appropriate in more holistically identifying and addressing equity issues affecting disadvantaged communities.

**Greenlots agrees that targets for vehicle-grid integration ("VGI") are essential, and broadly supports the five targets listed on page 101**

Greenlots appreciates the draft report's discussion regarding the critical importance of effective VGI in meeting the state's goals, and how it can improve energy access for transportation and the grid. While Greenlots recognizes that many of the details regarding this appear instead in the Commission's AB 2127 EV Charging Infrastructure Assessment also published this January, these five targets highlighted are important takeaways that recognize where the state is in regard to VGI proliferation, and important areas where progress must be made.

**The report's discussion of standardization and interoperability should be expanded beyond charging connectors**

Greenlots recognizes that the topic of standardization and interoperability as it relates to EV charging is also discussed more comprehensively in the Commission's AB 2127 EV Charging Infrastructure Assessment. This said, the discussion on page 85, and recommendation on page 101 are written where it could appear that charging connectors are the only interoperability related consideration for EV charging. Greenlots strongly recommends expanding this to discuss the broader set of interoperability considerations, in particular those related to hardware-software communication, VGI, and payments/roaming.

**The report should acknowledge the important and central role of utilities in advancing transportation electrification**

As currently written, the brief section on page 92-93 titled "Identify the Role of Utilities' Investments in Supporting Charging Infrastructure" fails to acknowledge the important and central role of utilities, both now and in the future as the market evolves. While the utility's role will also evolve over time, it will continue to be at the nexus of effective EV grid integration, and for the foreseeable future will have an important role in developing and supporting the development of EV charging infrastructure, especially in more difficult to reach market segments. Greenlots strongly urges this section to more comprehensively and even-handedly discuss this topic and these realities.

This includes evolving the discussion of AB 841 implications, which as written suggests that utilities do not and will not consider VGI solutions as alternatives to distribution infrastructure expansion. This in fact is a topic the CPUC is currently workshopping and has requested stakeholder comments regarding. Moreover, the CPUC recently directed the utilities to identify opportunities for automated load management and other VGI strategies in these scenarios. In

particular, Greenlots is excited by the prospect of utility programs and tariffs that hold the promise of driving value and demand for these VGI solutions.

**The Commission should hold a workshop for stakeholders to further review, discuss and better understand the "avoided cost of charging" concept**

Greenlots greatly appreciates Staff's initiative and innovative thinking in developing what it referred to as a Transportation Electrification Regulatory Policies Act (TERPA) concept, introduced at the IEPR Workshop on June 24, 2020, and described in the draft report as the "avoided cost of charging" on pages 95 and 96. The concept represents a unique approach building upon historical precedent and policy successes that very well could have valuable applicability to challenges associated with EV charging infrastructure deployment. Greenlots appreciates the written narrative describing how this could work, and is excited by the prospect it could hold in driving interoperability and standardization in the EV charging ecosystem.

At the same time, Greenlots has concerns that this approach could inappropriately and prematurely drive the EV charging market towards commoditization. At this stage of the market, and despite understandable desires to look to future market states, EV charging and related technologies are not ready for commoditization from a value standpoint, and policies and programs that support them should not treat them as commodities. Given that there is a lot of detail and nuance to unpack in the concept, Greenlots would encourage dedicating time to further explain, discuss and socialize the idea at a dedicated Commission workshop.

**Resiliency and EV charging will be a topic of increasing importance, which the report appropriately recognizes**

Greenlots appreciates the report's focus on EV charging resiliency in chapter 6, both in its ability to support grid resilience, and in the critical need to support resilient EV charging. These complimentary aspects of EV charging resiliency are appropriately discussed in a balanced manner, and Greenlots agrees with the Commission's recommendations, in particular the need for the CEC to invest in resiliency pilots and projects.

**Conclusion**

Greenlots appreciates the Commission's consideration of these comments, its ongoing efforts to support transportation electrification and advanced mobility, and looks forward to the road ahead.

Sincerely,

A handwritten signature in black ink, appearing to be a stylized name, possibly "L. H.", written over a horizontal line.

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Erick Karlen

Sr. Advisor, Policy & Market Development