

Stakeholder Comments Template

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The Joint EV Charging Parties appreciate CAISO Staff’s consideration of “Recognition of a behind the meter resource in load curtailment - Extending the meter generator output (MGO) model to EVSEs” within scope for ESDER 3.

This topic should be included because it possesses two compelling attributes 1) ease of implementation and 2) broader GHG policy imperatives.

With respect to ease of implementation, the CAISO staff resource requirements to pursue this topic should be minimal compared to other proposed topics given the immensely applicable Metering Generator Output (MGO) and Proxy Demand Resource sections of the Tariff, Business Practice Manual sections and supporting systems already in place, specifically:

1. The Demand Response Registration System (DRRS) is already equipped to handle an MGO location associated with the governing Service Account or unique identification number for the host’s utility meter.
2. The Demand Response System (DRS) and its successor can receive the same structure of information as required for Proxy Demand Resources
3. A Demand Response Provider and/or Scheduling Coordinator requesting use of EVSE submetering for settlement purposes would need to undergo a settlement quality meter data (SQMD) plan approval processes, like MGO participants.
4. Baseline methodologies currently in use and those approved by the Board as a result of ESDER Phase 2 are directly applicable and do not require any revisions at this time.

Relative to the other “yellow” topics, this issue appears significantly simpler to implement given the existing MGO precedent.

Regarding the underlying policy imperatives, transportation represents the largest share of GHG emissions left for California as the electricity generation sector has moved to aggressively decarbonize. Numerous executive, regulatory and legislative policies have

been instituted to tackle this large, challenging source of emissions to mitigate. Of particular note, today the Governor issued an [Executive Order](#) (B-48-18)¹ calling for the deployment of 250,000 electric vehicle charging stations to be deployed by 2025. This ESDER initiative can enable the maximum number of those installations are truly integrating electric vehicles with the state's very low carbon, yet more variable, grid

The advent of EVSE submetering can enable access to otherwise unachievable revenues streams. If these revenues can be reasonably relied upon, individuals and businesses can consider these revenues in the total net cost of ownership (TCO) calculus for electrified transportation. In this phase of EV adoption and hardware cost declines, lower TCO will “tip” the calculus in favor of transitioning to electrified transportation, thereby materially contributing to accelerated GHG reductions.

Given the nexus between energy storage, renewables integration and EV charging, the Joint EV Charging Parties intend to monitor and participate in the Load Shift initiative in ESDER 3. As currently contemplated by CAISO Staff, Load Shift provided by EV charging would not be in scope. Implementing EVSE submetering is a critical first step to enabling Load Shift in a similar fashion as Staff is contemplating for MGO resources. The Joint EV Charging Parties would hope that the Load Shift product ultimately proposed to the Board is structured such the framework can be adapted and applied logically to submetered EVSE resources at a future date or through a future ESDER phase.

¹ “GOVERNOR BROWN TAKES ACTION TO INCREASE ZERO-EMISSION VEHICLES, FUND NEW CLIMATE INVESTMENTS,” January 26, 2018, <https://www.gov.ca.gov/news.php?id=20151>

About eMotorWerks

eMotorWerks, an Enel Group Company, developed and operates JuiceNet®, the leading electric vehicle (EV) cloud-based smart charging platform, and the company is the manufacturer of best-selling and best-rated residential EV charging station, the JuiceBox Pro, through Amazon.com and its own web store, with over approximately 30,000 charging stations sold worldwide to date. eMotorWerks embeds the JuiceNet platform in its own residential and commercial EV charging stations, as well as third-party electric vehicle supply equipment (EVSE), including models from AeroVironment, Clipper Creek, Volta, Nayax, and a growing list of other manufacturers. eMotorWerks was acquired by Enel Group in October 2017.

About ChargePoint

ChargePoint is the largest electric vehicle (EV) charging network in the world, with charging solutions for every charging need and all the places EV drivers go: at home, work, around town and on the road. With more than 43,000 independently owned charging spots and more than 7,000 customers (including workplaces, cities, retailers, apartments, hospitals and fleets), ChargePoint is the only charging technology company on the market that designs, develops and manufactures hardware and software solutions across every category. Leading EV hardware makers, automakers and other partners rely on the ChargePoint network to make charging station details available in mobile apps, online and in navigation systems for popular EVs. ChargePoint drivers have completed more than 32 million charging sessions, saving upwards of 31 million gallons of gasoline and driving more than 744 million gas-free miles.

About Volta Charging

Founded in 2010, San Francisco-based Volta has developed, proven and fine-tuned an innovative approach to EV charging. Partnering with national brands that sponsor the public amenity, Volta deploys and operates networked chargers at prominent and convenient community venues such as shopping centers and civic entertainment districts. Charging is offered free to drivers, while site hosts benefit from hardware, installation and lifetime maintenance at no cost. The strategic destinations and careful siting of Volta community charging drive both high-utilization and high-visibility, establishing Volta as an incredibly effective catalyst for EV adoption. Last year in California, Volta stations powered more than 7 million free electric miles, avoiding nearly 3.1 million pounds of CO2 and delivering an industry-record average of 7 charges per Level 2 port daily. More than two thirds of non-EV drivers who see Volta's charging amenities say they will consider a plug-in electric vehicle for their next car purchase.

About Chanje Energy, Inc.

Chanje Energy is a California-based OEM delivering medium duty electric vehicles and turnkey energy infrastructure services for the last mile industry. We're focused on creating sustainable solutions that improve how companies move people and packages from transportation hubs to their final destinations.