
BEFORE THE STATE UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's Motion Consider Alternative Vehicle Tariffs, Infrastructure Rulemaking R.13 (Filed November 14, 2013) and Policies To Support California's Greenhouse Gas Emissions Reductions

Rulemaking 13011007 Filed November 14, 2013)

Valent Power In Opening Comments on Scoping Memo Questions

August 29, 2014

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Valent Power, Inc. Comments on California Public Utilities Commission's Memo on Alternative Fueled Vehicle Programs, Tariffs, and Policies Rulemaking (13-11-007) (Filed November 14, 2013)

7

Valent Power, Inc. respectfully submits these comments on the California Commissioner's Ruling and Scoping Memo, mailed July 16, 2014.

Valent Power, Inc. (Valent Power) supports the California and Alternative Fuel Vehicle (AFV) Guiding Principles, and we support an increased utility role in electric transportation and market education.

Valent Power is involved in sales and marketing directly affecting, and are impacted by, this proceeding. The market is important to both the automotive and electrical closely together to proactively seek sustainable energy and the state of California.

Electrification of our transportation sector is key to achieving greenhouse gas emissions reduction goals, petroleum reduction, Clean Air Act air pollution reduction goals. The market continues to grow, but growth is not rapid enough to meet objectives.

PEV charging infrastructure access is a critical element of electrification. We encounter many challenges when seeking to charge especially fast charging. Reducing barriers to plug-in electric vehicle (EV) acceleration market success, and utilities should be allowed, to larger EV adoption. PEV infrastructure deployment and market education to consumer adoption of PEVs.

I. Discussion—Scoping Memo Questions

Valent Power comments on its specific questions raised in OIR (13-11-007) are outlined below:

Question 4: How should the commission mitigate the impact on entities pursuing transportation electrification?

As a manufacturer of EVSE DC Fast Chargers, Valent Power charges are holding back the installation of charging infrastructure, but most particularly where DC Fast Charging stations are located.

utility infrastructure limitations. Increasingly, lack of access as a key consumer barrier.

To reduce barriers to PEV adoption, Valent Power hopes to evaluate alternative methods of cost recovery for DC fast charging sites that run the risk of incurring demand experience in the state of Connecticut, where the public has demand charges while substituting an additional four electric transportation chargers for an alternative method for the electric transportation chargers.

Valent Power also believes that there are technical solutions to some of these issues, such as providing DC fast charging stations in 208V 3-phase AC utility services or even single types of creative solutions that should be considered by the rulemaking.

II. Conclusion

Valent Power appreciates the opportunity to share its view of the Commission on the Order Instituting Rulemaking to Vehicle Programs, Tariffs, and Policies, Rulemaking 13-007. The Commission supports an increased role for utilities in PEV market education.

Dated: August 29, 2014, at Scotts Valley, California.

Respectfully submitted,

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