

**From:** Greenfader <david.greenfader@envisionsolar.com>  
**Sent:** Wednesday, May 17, 2017 12:40 PM  
**To:** VGIworkinggroup  
**Subject:** Comment

Envision Solar is a EV Service Provider and California manufacturer of the world's first off-grid – transportable solar EV charging station - the EV ARC™ which is currently on statewide mandatory contract with State of CA – DGS [#1-15-61-16].

Envision Solar enthusiastically supports the electrification of transportation and deployment of EV charging infrastructure to support it. We enthusiastically support that the VGI workgroup consider [off-grid solar electric vehicle charging](#) infrastructure as a service provider for EVs a stakeholder.

We see equipment such as ours, transportable off-grid solar charging stations as a gateway between the V2G communication and one which represents another opportunity for California to continue in the right direction as it supports increased adoption of Electric Vehicles by providing alternative funding for charging infrastructure which isn't grid dependent.

Free from grid, this form of distributed generation represents one of the cleanest, fastest deployed, most flexible and scale-able solutions available anywhere. This kind of equipment is also expanding the way we look at emergency planning. The City of New York last week announced that it will procure EV ARCs as part of their resiliency plan specifically using Hurricane Sandy dollars. For resiliency purposes; NYC is planning on deploying them in numbers, along with 1000 EVs. EV ARCs will be a part of DCAS's strategic petroleum reserve for their EVs. Fresh from Hurricane Sandy, NYC is all too aware of the implications of grid and generator failure. They know now that having an additional tertiary layer of backup power which is renewable, requiring no refueling, no oil changes and no regular servicing is pertinent, not to mention one which will save lives.

We urge the CPUC and the VGI Workgroups to consider how integrated renewably generated and stored energy supplies to the EV charging environment is wise as a hedge against grid outages, natural disasters and other potential disruptions.

In sum, care should be taken to ensure that there is no language in any of the approved plans which prohibits or discourages the use of funds for procurement of off-grid locally generated renewable sources of energy as a source of electricity for Electric Vehicle charging or disaster preparedness and risk mitigation. Regardless of who owns the infrastructure the plan should allow for use of funds in the deployment of off grid solutions as well as grid connected V2G solutions. Entities should not be financially penalized or otherwise prevented from using off grid solutions to energize EV charging infrastructure if those solutions present the best method of energizing the chargers and supporting our clean energy mission.

Best,

David

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