



July 28, 2021

Michelle Turner
Administrative Secretary
Efficiency Maine Trust
168 Capitol Street, Suite 1
Augusta, ME 04330-6856

Re: Comments on Draft Triennial Plan V

Dear Ms. Turner:

Greenlots appreciates the opportunity to provide comments to the Efficiency Maine Trust (“the Trust”) in response to its draft Triennial Plan V (Fiscal Years 2023 – 2025).

Greenlots is a leading provider of electric vehicle (EV) charging software and services, and a member of the Shell Renewables and Energy Solutions group. The Greenlots network supports a significant percentage of the direct current fast charging (DCFC) infrastructure in North America and an increasing number of Level 2 chargers. 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. Greenlots has worked with several customers to apply for funding through the Trust’s recent DCFC funding solicitation. We look forward to being able to leverage opportunities like these in the future.

Maine has ambitious climate and energy goals, including reducing greenhouse gas emissions by 45% by 2030 and 80% by 2050. According to a 2020 report from the Department of Environmental Protection on progress toward meeting goals, the state has successfully reduced emissions across all sectors except transportation, which now accounts for 54% of all carbon dioxide emissions, up from 44% in 1990.¹ Recent climate planning efforts have recognized the significant emissions coming from this sector. In December 2020, the Maine Climate Council released its four year plan, *Maine Won’t Wait*. The plan called for putting 41,000 light-duty EVs on the road by 2025 and 219,000 by 2030.² Achieving these targets will require the groundwork to be laid over the next several years.

¹ See *8th Biennial Report on Progress toward Greenhouse Gas Reduction Goals* (2020). Maine Department of Environmental Protection.

² See *Maine Won’t Wait* (2020). Maine Climate Council.

https://www.maine.gov/future/sites/maine.gov.future/files/inline-files/MaineWontWait_December2020.pdf.

Efficiency Maine Trust is in a key position to lead the state toward achievement of these important goals. As the draft Triennial Plan V notes, to reach its target Maine should be adopting policies and programs that can at least double the rate of EV sales every year for the next five years. Greenlots recognizes that there are many unknowns currently at play – the development of a clean transportation roadmap, New England Clean Energy Connect settlement funding inflows, and the potential release of federal funding for transportation electrification, among others. Citing these unknowns, the Trust has chosen not to model market potential for transportation electrification.

At the same time, significant activity in the EV space will be needed to meet state goals. While utilities have been approved for small pilots, Efficiency Maine Trust programs represent the most significant and durable source of support for EVs and EV charging deployment to date. While the Trust has clear objectives, the draft plan leaves many details to be determined. As a stakeholder with an interest in growing commercial opportunities for both Greenlots and our customers in Maine, Greenlots finds this concerning.

In order to create more commercial certainty and enable complementary stakeholder planning, Greenlots suggests that the Trust update its Triennial Plan V to include more granularity related to its transportation electrification activities. Specifically:

- How much funding will be allocated to each program element included in Efficiency Maine's plan? The Trust includes such budget breakouts for other program areas (e.g. Home Energy Savings Program, Low-Income Initiatives). A similar breakdown should be included to outline the activities included in the transportation category. How much does the Trust plan to commit to EV rebates, education, and incentives for charging deployment, respectively?
- Does the Trust have targets for EV charging deployment, within current budget constraints, and can those targets be divided in ways that will help guide investment plans? Understanding how many DCFC, public L2, or workplace L2 ports the Trust plans to incentivize can help businesses like Greenlots more effectively guide customers toward opportunities.
- Can the Trust identify areas of increased activity, or higher deployment goals, should additional funding become available (as may be the case with respect to federal funds)? What activities would the Trust need to scale in order to meet state goals, and what funding would be needed to support those activities?

Greenlots recognizes that additional planning efforts are underway to facilitate Maine's transition to clean transportation. Greenlots therefore urges the Trust to offer a pathway to update and incorporate stakeholder input into the transportation section of its Triennial Plan V based on the directives of the statewide Clean Transportation Roadmap, which will be developed over the course

of this year. As the draft Triennial Plan notes, the Roadmap will offer important context, and may spur the need to update, expand, or change Trust offerings in the transportation sector. However, Greenlots encourages the Trust not to wait for the Roadmap to more fully plan and develop its transportation initiatives. Creating a clear understanding of the Trust's current plans will only benefit future planning efforts. Meeting Maine's climate goals and EV deployment targets will require coordinated efforts. Efficiency Maine Trust will play a key role, but as the Triennial Plan notes, funding shortfalls are likely a reality. Laying out specific plans, including program designs and charging deployment goals, will help other stakeholders, including utilities, regulators, and policymakers, to identify and fill gaps.

Greenlots is pleased to provide these comments on the Trust's draft Triennial Plan V, and looks forward to working with the Trust, utilities, and stakeholders to expand Maine's EV charging landscape.

Sincerely,

A handwritten signature in black ink, appearing to read "AG", with a long horizontal line extending to the right.

Annie Gilleo
Manager, Policy and Market Development