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Terawatt Infrastructure comments on the 2025â€“2026 Investment Plan Update for the Clean Transportation Program

Please see the attached document for Terawatt Infrastructure's comments on the 2025â€“2026 Investment Plan Update for the Clean Transportation Program

Additional submitted attachment is included below.



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California Energy Commission
Docket No. 25-ALT-01
715 P Street
Sacramento, CA 95814

November 7, 2025

Re: 2025-2026 Investment Plan Update for the Clean Transportation Program

Dear Commissioners and Staff,

Terawatt appreciates the opportunity to provide comments on the 2025–2026 Investment Plan Update for the Clean Transportation Program and commends the Energy Commission for its continued leadership in advancing California’s transition to zero-emission transportation. The Commission’s work to accelerate EV charging infrastructure deployment has been instrumental in positioning California as the national leader in clean transportation.

Headquartered in San Francisco, Terawatt designs, develops and operates large-scale electric vehicle charging sites for commercial fleets. Our mission is to accelerate the transition to zero-emission transportation by delivering reliable, high-powered charging infrastructure that supports fleets adopting electric vehicles. With multiple planned and operating charging hubs across California, we are proud to play a key role in enabling the state’s economic competitiveness and climate leadership.

Medium- and Heavy-Duty ZEV Infrastructure

Terawatt appreciates the Commission’s strong support for medium- and heavy-duty (MHD) vehicle infrastructure deployment in recent years, and encourages the Commission to increase this focus over the coming years to continue California’s leadership in MHD electrification despite strong market headwinds. The California Air Resources Board’s most recent round of the Clean Truck and Bus Voucher Incentive Project (HVIP) was fully subscribed soon after opening, demonstrating continued interest in battery electric vehicle (BEV) adoption among fleets on a total-cost of ownership basis. Additional truck incentive funding will be available in a forthcoming round of HVIP and the Low Carbon Fuel Standard Clean Fuel Rewards Program. As resulting demand for charging increases, Terawatt recommends that the amount of available funding for charging infrastructure deployment also increases to ensure that infrastructure deployment continues to scale at this key inflection point for the industry.

In addition to increasing the amount of funding available for MHD charging infrastructure deployment, Terawatt also recommends that the CEC consolidate MHD funding opportunities under fewer programs and solicitations, and streamline program requirements to reduce the complexities associated with seeking and receiving funding.





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Finally, Terawatt respectfully requests that the CEC continue to support shared charging sites as well as MCS deployment in its solicitations, and explicitly allow for charger upgrades at existing sites.

- Consolidating funding opportunities: Terawatt recognizes the work of the CEC to develop MHD charging solicitations such as GFO-24-612 and the EnergIIIZE MCS funding lane to ensure that a mix of charging infrastructure business models and product offerings can access grant funding. However, doing so across multiple solicitations and programs reduces the amount of MHD funding available at any one time, and creates a less reliable schedule of funding availability for project developers. We recommend that the CEC consolidate the majority of MHD charging funding under the EnergIIIZE Program and then revisit the need for more tailored solicitations as the infrastructure market moves from nascency to widespread deployment. Doing so may also enable the CEC to offer larger awards per solicitation, which can help reduce a greater portion of the significant costs associated with developing MHD charging infrastructure sites.
- Supporting shared depots: Terawatt appreciates the efforts of the CEC over the last year to include shared charging depots as a charging business model eligible for funding in addition to publicly accessible charging sites. These depots are an important option for fleets considering electrification as they offer guaranteed access to charging infrastructure in a depot setting, without the added costs of installing infrastructure on their own facilities. Along with other industry stakeholders, Terawatt has previously provided detailed comments about the benefits of this model in a prior CEC Request for Information¹. We recommend that the shared charging business model be included as eligible for all MHD charging funding solicitations to support a market driven deployment of infrastructure that best meets the needs of first-mover fleets.
- Funding MCS deployment and charger upgrades at existing MHD sites: Finally, Terawatt commends the CEC for beginning to focus its funding efforts on MCS infrastructure deployment, which will become the predominant charging standard for electric MHD vehicles over the coming years. Recognizing that MCS is soon to become a true “standard,” the CEC has continued its market catalyzing efforts to fund MCS deployment via the EnergIIIZE MCS Funding Lane. As MCS becomes the predominant charging standard, existing MHD charging sites that previously offered only Combined Charging System (CCS) charging to customers will need to be upgraded to include MCS capabilities. We respectfully request that MCS

¹ [Terawatt Infrastructure comment on RFI for Medium- and Heavy Duty Zero Emission Vehicle Public Charging](#)





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upgrades to existing MHD charging sites be made explicitly eligible, not eligible on a case-by-case basis, in the CEC's funding opportunities.

Light Duty Charging Infrastructure

Terawatt supports the proposed \$98.5 million allocation for Light-Duty Electric Vehicle Charging Infrastructure within the FY 2025–2026 Investment Plan Update. This funding will be critical to expanding access charging infrastructure and ensuring that California meets its ambitious ZEV deployment goals including the Clean Miles Standard. We respectfully encourage the Commission to include dedicated funding within the light-duty investment category to support fleet-focused charging infrastructure, including for autonomous and rideshare fleet operations.

Light-duty fleet electrification—ranging from delivery services to ride-hailing and emerging autonomous vehicle fleets—represents one of the fastest-growing market segments in clean transportation. Ensuring that these fleets have access to reliable, high-powered charging at shared and third-party facilities will be essential to achieving widespread light-duty fleet electrification.

Supporting light-duty fleet charging infrastructure provides multiple benefits:

- Access to shared or third-party charging reduces the upfront costs for fleets, accelerating their transition to and deployment of zero-emission vehicles.
- Enabling multiple fleet operators to use high-powered sites improves infrastructure utilization and de-risks private investment.
- Strategically located fleet charging hubs can optimize grid interconnections, support load management, and reduce the need for redundant infrastructure.
- As a rapidly expanding segment of the electric fleet industry, charging sites for light-duty fleets can create new clean energy jobs in California.

These benefits align closely with the Commission's guiding principles of maximizing emissions reductions, leveraging private investment, supporting equity, and ensuring efficient use of ratepayer and public funds.

Thank you for your leadership and the opportunity to provide input. We look forward to continuing to work together to ensure California remains at the forefront of the transition to zero-emission transportation.

Sincerely,

Sam Vercellotti
Director of Policy
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