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Clean Transportation Comment - Orange EV

Additional submitted attachment is included below.

May 22, 2026

Subject: Orange EV Comment on the CEC's 2026-2027 Clean Transportation Program Investment Plan

To the California Energy Commission:

Orange EV appreciates the opportunity to submit comments on the California Energy Commission's ("CEC") 2026-2027 Investment Plan Update for the Clean Transportation Program (the "Plan").

As the leading manufacturer of electric Class 8 terminal trucks (also called terminal tractors or yard trucks), Orange EV has a direct stake in the initiatives set forth in this Plan, as well as practical, on-the-ground experience deploying zero-emission solutions in the freight sector. Terminal tractors are among the most electrification-ready technologies within the medium- and heavy-duty vehicle (MHDV) space: they offer the best use-case for electrification, are a turn-key solution for early adoption, and contribute outsized emissions reductions without compromising performance.

We thank the CEC for its continued leadership in advancing decarbonization. Orange EV offers the following comments to strengthen where the Plan's MHDV infrastructure strategy would benefit from a more explicit commitment to funding private or shared charging sites at freight yards, distribution centers, and the ports. By targeting EV infrastructure at private or semi-private sites California would reap the benefits of outsized emissions reductions, thereby helping California achieve its clean transportation and decarbonization goals.

First, Orange EV urges the CEC to prioritize EV infrastructure funding for private and semi-private sites, specifically at ports, freight yards, and distribution centers.

Lack of access to proper charging infrastructure remains one of the primary barriers facing fleets when transitioning to zero-emission vehicles and equipment. While public charging investments are critical for light-duty and over-the-road vehicle adoption, infrastructure funding for private and shared sites are equally important in reducing emissions from the MHDV sector.

The Plan itself recognizes that medium- and heavy-duty vehicles "represent a small share of California registered vehicle stock but are a major source of NOX and PM emissions especially near ports and goods movement corridors" and are "responsible for about 21 percent of on-road GHG emissions in the state." These vehicles and the non-road equipment that operate alongside them at freight facilities are concentrated at the very sites where behind-the-fence charging would have the greatest impact.

One benefit of prioritizing private or semi-private sites stems from the benefit of those sites having market-ready zero emission vehicles and equipment ready to deploy, such as terminal tractors. Unlike some MHDV segments where zero-emission technology remains in pilot or early-commercialization stages, electric terminal tractors are a mature, proven product operating in fleets across the country. Orange EV alone has completed over 1,900 deployments, collectively logging over 12.9 million key-on hours and more than 33.8 million operational miles. However, the main hurdle to broader adoption at freight facilities remains the high cost of preparing an electric-ready site and of the EVSE equipment itself. Directing Clean Transportation Program funds

toward these costs would remove the primary barrier keeping private yards dependent on diesel.

Second, behind-the-fence infrastructure investments yield disproportionate emissions reductions per dollar invested.

Diesel terminal tractors are disproportionate polluters compared to their numbers: replacing a single diesel terminal tractor with a zero-emission unit yields emissions reductions disproportionately large relative to what its vehicle classification alone would suggest.

Unlike over-the-road trucks operating at highway speeds, terminal tractors always run at low speeds in continuous start-stop duty cycles with extended idle times. Due to this operating profile, diesel particulate matter and nitrogen oxides are not combusted as efficiently as they would be in sustained highway driving. The result is concentrated, localized emissions of precisely the co-pollutants the Plan seeks to reduce: PM2.5, NOX, and diesel particulate matter.

When infrastructure upgrades at a private site are not financially feasible, fleets that would otherwise transition to zero-emission equipment remain locked into diesel operations. Each year a fleet delays electrification because it cannot afford site preparation or EVSE is another year that surrounding communities absorb preventable pollution. CEC investment in behind-the-fence charging breaks this cycle at the source.

Third, funding private-site charging infrastructure directly advances the Plan's equity commitments.

The Plan states that at least 50 percent of Clean Transportation Program funds must benefit low-income and disadvantaged communities, and that 94 percent of recent program funding has gone to projects in areas of nonattainment. Freight facilities are disproportionately sited in these same communities. Residents near ports, rail yards, and distribution centers inevitably bear the health consequences of diesel terminal truck operations.

Because terminal trucks operate "behind the fence" within the confines of freight yards and warehouse facilities, they are not publicly visible, leading them to be systematically overlooked by clean truck regulations and MHDV incentives that focus exclusively on on-road emissions. This gap between visibility and policy is precisely what the Investment Plan should address. Funding behind-the-fence infrastructure brings the benefits of the state's clean transportation investments to communities that need them most, at sites where emissions reductions can be achieved immediately with proven technology.

The Plan's recognition that "infrastructure projects that enable converting diesel and other fossil-fueled trucks, equipment, and buses to zero emissions will significantly reduce local air pollutants, which often affect low-income and disadvantaged communities around major freight corridors, ports, and schools" supports precisely the type of private-site investment Orange EV recommends.

Final Remarks

The 2026–2027 Investment Plan Update is a well-constructed framework for advancing California's clean transportation goals. Orange EV's comments are intended to sharpen its effectiveness in a segment where meaningful emissions reductions are achievable now, with proven technology, at a cost profile that benefits both fleet operators and the state's climate goals.

Dedicating a meaningful share of MHDV infrastructure funding to private and semi-private depot charging creates a high-impact, capital-efficient pathway to decarbonize freight operations. This approach removes the cost barrier that keeps private yards dependent on diesel, delivers localized health benefits to the disadvantaged communities surrounding freight facilities, and maximizes the return on every Clean Transportation Program dollar by reducing cost and making EVSE equipment and infrastructure more accessible.

Orange EV welcomes further dialogue with the CEC and stands ready to provide additional data, operational case studies, or technical information to support the development of the final plan. Thank you for your consideration of these comments.

Respectfully,

Jason Dake

Vice President of Legal and Regulatory Affairs