

**DOCKETED**

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## **Volvo Group North America Comments**

Attached please find comments from Volvo Group North America regarding the California Energy Commission's 2026-2027 Investment Plan Update for the Clean Transportation Program.

*Additional submitted attachment is included below.*

[2026-05-22](#)

Commissioner Nancy Skinner  
Presiding Member of the Clean Transportation Program Advisory Committee  
California Energy Commission

Drew Bohan  
Executive Director  
California Energy Commission

Spencer Reeder  
Director, Fuels and Transportation Division  
California Energy Commission

Melanie Vail  
Deputy Director, Fuels and Transportation Division  
California Energy Commission

**RE: 2026–2027 Investment Plan Update for the Clean Transportation Program**

Dear Commissioner Skinner and Energy Commission Staff:

On behalf of Volvo Group North America (Volvo), we appreciate the opportunity to provide comments on the California Energy Commission's (CEC) 2026–2027 Investment Plan Update for the Clean Transportation Program (CTP). We support the CEC's continued commitment to medium- and heavy-duty (M/HD) zero-emission vehicle (ZEV) infrastructure and respectfully encourage the Commission to prioritize and expand investments in this area to the greatest extent feasible.

Volvo also supports and aligns with the comments submitted by Powering America's Commercial Transportation (PACT), which outline the broader market context and continued need for sustained investment in M/HD ZEV infrastructure. These comments are intended to supplement that perspective with observations from Volvo's direct deployment experience supporting commercial vehicle electrification projects.

Volvo has been an active participant in California's transition to commercial vehicle electrification and has worked with fleets, utilities, charging developers, dealers, and public partners on real-world M/HD ZEV deployments across the state and country. Through these deployments, one lesson has become increasingly clear: for commercial

vehicle electrification, the critical path is no longer vehicle technology readiness—it is infrastructure deployment and energization.

While significant progress has been made, deploying M/HD charging infrastructure remains a complex, multi-year process involving utility interconnection studies, site development, permitting, and construction timelines that often extend beyond fleet procurement cycles. Even where fleets are prepared to invest in vehicles, delays in charging infrastructure deployment can slow or defer project implementation.

We also recognize and appreciate ongoing efforts across California to improve deployment conditions. Recent actions by the California Public Utilities Commission to reduce energization timelines and improve utility planning processes represent important steps toward addressing deployment barriers. These reforms can help improve predictability and reduce friction, but implementation will take time, and continued infrastructure investment remains essential during this transition period.

At a time when infrastructure funding sources face increasing uncertainty, maintaining momentum on M/HD charging deployment will be critical. Investments in vehicle incentives alone cannot deliver intended outcomes if infrastructure deployment lags behind vehicle availability and customer demand.

For these reasons, Volvo supports the CEC's continued investment in M/HD ZEV infrastructure and encourages the Commission to prioritize this category within the Clean Transportation Program update. Sustained investments today can help ensure that California's infrastructure ecosystem evolves in parallel with vehicle deployment and supports successful long-term market growth.

Thank you for your consideration and continued leadership.

Kind regards,



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## About the Volvo Group

Volvo Group drives prosperity through transport and infrastructure solutions, offering trucks, buses, construction equipment, power solutions for marine and industrial applications, financing and services that increase our customers' uptime and productivity. Founded in 1927, the Volvo Group is committed to shaping the future landscape of sustainable transport and infrastructure solutions. The Volvo Group is headquartered in Gothenburg, Sweden, employs almost 100,000 people and serves customers in more than 190 markets. North America is a major market for the Volvo Group, employs more than 17,000 people, and operates 10 manufacturing and remanufacturing facilities in seven U.S. states, as well as three plants in Canada and one in Mexico.

In California, Volvo Group North America and its dealers employ more than 1,000 people with locations in Bakersfield, Corona, Costa Mesa, Fresno, Hayward, Lakeside, Mira Loma, Redding, Sacramento, San Leandro, and Turlock. Volvo Group is in the process of training and certifying dealers to sell and service its electric products, and 6 dealers in California have been certified with more expected to be added soon.

Volvo has spent years developing complete solutions for electromobility, and today – in North America – we are selling many configurations of the Volvo VNR Class 8 Electric<sup>1</sup> truck, the Mack LR Electric<sup>2</sup> waste hauler, the Mack MD Electric<sup>3</sup> work truck, and electric Volvo Construction Equipment models<sup>4</sup>. Volvo offers its perspective as an active participant in the zero-emission transportation sector, and as one of the nation's leading providers of zero-emission infrastructure and transport solutions.

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<sup>1</sup> <https://www.volvotrucks.us/trucks/vnr-electric/>

<sup>2</sup> <https://www.macktrucks.com/trucks/lr-series/lr-electric/>

<sup>3</sup> <https://www.macktrucks.com/trucks/md-electric/>

<sup>4</sup> <https://www.volvoce.com/global/en/our-offer/emobility/>