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Grant Management Associates Comments on Medium- and Heavy-Duty Infrastructure Funding Concepts

Additional submitted attachment is included below.



To: California Energy Commission

Christina Cordero

From: Grant Management Associates

Owner, Kristin Cooper Carter

Date: November 11, 2019

RE: Medium- and Heavy-Duty Infrastructure Funding Concepts

Grant Management Associates is pleased to submit these comments in support of the California Energy Commission's Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure Funding Concepts (19-TRAN-02).

Grant Management Associates (GMA) is a California-based firm, nationally recognized as experts in grant writing and project management, with team members located in strategic areas across the United States. GMA has had experience with more than 50 projects funded under the AB 118 Clean Transportation Program. We appreciate the goals and objectives of the Clean Transportation Program and its positive effect on our state. We strongly support the future direction of advancing California's clean energy and transportation goals by impacting and focusing on sustainable transportation technologies and fuels. Please see our comments below in support of the proposed Funding Concepts.

CONCEPT #1: FREIGHT, ZERO-EMISSION VEHICLE INFRASTRUCTURE DEPLOYMENT FOR VEHICLE DEMONSTRATIONS

We find a strong need for this proposed focus area from our clients.

We would like to encourage the Commission to make mobile refuelers; for both hydrogen and battery electric applications, to be eligible for funding. We are finding that mobile refuelers are commonly used in an array of industrial freight applications, particularly in California's ports and could be used more at airports and for other applications. Zero-emission mobile refuelers would enable these important transportation fuels to reach into portions of industrial operations that are not well-suited for stationary refueling or recharging infrastructure.

We believe the Commission's proposal to require a Preliminary Capacity Check is based on issues you may have faced associated with the on-site electrical demands and capacity needed to support some of these projects. This step will help the applicant to better determine the requirements and costs for electrical upgrades.



The ban against funding commercially available technologies keeps many of our clients from being able to participate in this funding. As you are aware there are many commercially available technologies that have not yet been used in the application of medium- and heavy-duty industries. This requirement may be precluding valuable integrated approaches combining a variety of technologies thus supporting technological partnerships that could served our state well. We have run into this situation on several application efforts. We strongly believe that it is best to be as inclusive as possible to encourage as much innovation and the highest efficiencies possible.

Adding the DAC requirement to this Concept all but ensures that most of the projects will be located from Sacramento south. This requirement will make it hard for viable projects in the northern part of the state. There are very few areas that are considered to be DAC given how the CalEnviroScreen tool functions.

CONCEPT #2: TRANSIT AND TRUCK FLEETS, CAPITAL EXPENSE ASSISTANCE FOR ZERO-EMISSION INFRASTRUCTURE DEPLOYMENT

If possible, some of the rural areas could use assistance with CEQA costs. To include them in this support for infrastructure deployment would be quite beneficial for them. If not, please do not require CEQA to be in hand at time of submission.

CONCEPT #3: ZEV BLUEPRINTS FOR MD/HD VEHICLES INFRASTRUCTURE (INCLUDING SMALL SEAPORTS AND DACS)

This concept seems similar to the Plug-In Electric Vehicle Readiness Plans funded by the Commission which was an integral part of enabling communities and the industry to prepare for the future widespread electrification of transportation.

In order to make this funding spread equitable, it may be appropriate to provide funding based upon geographic sector. When this approach was taken with the Plug-In Electric Plans—it allowed for a spread of viable efforts across the state. This type of allocation would better enable a diversity of statewide efforts, encouraging smaller fleet owners and smaller facility operators to also participate in these important exercises.

CONCEPT #4: HYDROGEN RAIL & MARINE APPLICATIONS We fully support the Commission's proposal to fund the future deployment and demonstration of hydrogen fuel cell rail and marine technologies in freight applications.

CONCEPT #5: MISCELLANEOUS - LONG-HAUL AND INNOVATIVE APPLICATIONS

We strongly encourage support for infrastructure for long-haul truck vehicles on all major corridors.

If you have any questions about the comments that we have submitted, please do not he sitate to reach out to me at kcarter@grantmanagementassoc.com