

DOCKETED

Docket Number:	19-TRAN-02
Project Title:	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
TN #:	232761
Document Title:	Jaimie Levin Comments - 19-TRAN-02 Blueprints and Block Grants for MDHD ZEVs and ZEV Infrastructure
Description:	N/A
Filer:	System
Organization:	Jaimie Levin
Submitter Role:	Public
Submission Date:	4/16/2020 3:05:18 PM
Docketed Date:	4/16/2020

*Comment Received From: Jaimie Levin
Submitted On: 4/16/2020
Docket Number: 19-TRAN-02*

19-TRAN-02 Blueprints and Block Grants for MDHD ZEVs and ZEV Infrastructure

Additional submitted attachment is included below.



Headquarters
730 Peachtree Street, Suite 450
Atlanta, GA 30308
P :: 678-244-4150 • F :: 678-244-4151

California Office
1960A University Avenue
Berkeley, CA 94704-1238
P :: 510-851-0625 • F :: 510-525-2231

April 16, 2020

Katie Herter
Alex Wan
Freight and Transit Unit
Advanced Fuels and Vehicle Technologies Office
Fuels and Transportation Division
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-552

RE: Docket #19-TRAN-02
Blueprints for MD/HD ZEVs and ZEV Infrastructure, and
Block Grant for MD/HD ZEV Infrastructure

Dear Ms. Herter and Mr. Wan,

Thank you for the opportunity to provide comments on your two draft solicitation concepts related to MD/HD ZEVs and ZEV Infrastructure. On behalf of the Center for Transportation and the Environment (CTE), I would like to share the following comments on Blueprint planning, Block Grant evaluation criteria, and grant administration services.

- Blueprint planning is an extremely useful tool to develop and execute successful projects, but timing is critical. CTE proposes that you offer scalable grants to assist with planning for both near-shovel ready projects and longer-range, regional projects. The shovel ready project grants should be in the range of \$100,000 to \$200,000, whereas the longer-range grants will need to be as much as \$500,000 to \$750,000 to adequately address large-scale, regional implementation plans.

There are a number of zero-emission bus and freight-related projects that are already at a preliminary stage of conceptual development and ready to proceed with more detailed plans. A project implementation planning grant of \$100,000 to \$200,000 would help expedite these projects. Additionally, CEC should utilize the Blueprint funds to leverage CARB-funded vehicle grants and CEC implementation grants. As you know, CARB is planning to release a Zero-Emission Class 8 Drayage Truck solicitation in the amount of \$20 million. We strongly encourage CEC to collaborate with CARB to link their funding to CEC's Solicitation Concept #1, in the amount of \$20 million, for infrastructure to support freight vehicle demonstrations. It would be ideal to offer Blueprint grants to develop detailed project plans that could then be leveraged to seek capital funds to build ZEV projects more quickly.

We would also suggest that applicants be able to submit multiple applications for one or more projects, if those projects are not linked geographically or organizationally. For instance, truck and bus fleet operators have different duty cycles and operating constraints, so a bus project may look entirely different than a freight project and the ability to share infrastructure resources and logistics may not be practical.


- CTE recommends the Block Grant program be heavily weighted toward performance-based outcomes. As we transition to zero-emission MD/HD fleets, performance criteria related to vehicle range, vehicle curb weight enabling maximum payloads and passenger capacity, affordable infrastructure, operational efficiencies that mirror existing fleet logistics, and resiliency, are critical factors that should be carefully evaluated. Resiliency is especially important in California, where essential services associated with transit and freight movement must be available in response to natural disasters, such as earthquakes and wildfires. These vehicles will be needed to transport people in need and material supplies during and after catastrophic events. Additionally, as heavy-duty battery electric and fuel cell electric vehicles deploy more widely, their onboard energy storage could also serve as a resource for exportable power to facilities in need of electricity, if and when the grid is unavailable. As an example, a 40' fuel cell electric bus stores as much as 600 kWh of energy on board. A 60' fuel cell electric bus stores more than one MWh of energy. Each of these vehicles can be refueled in a matter of minutes.
- CTE recommends that the Block Grant administrator proposal be structured in a manner that allows the administrator to be eligible for block Grant funding on behalf of MD/HD fleet operators, or at a minimum, be eligible to participate as a team member in one or more Block Grant projects as a Project Manager.

CTE is a nonprofit organization, with considerable experience executing both battery-electric and fuel cell electric transit and freight projects. We are currently engaged in large-scale transit deployments using battery-electric and fuel cell electric vehicles throughout the United States. We are also overseeing several freight-related projects deploying zero-emission Class 6 and 8 trucks and off-road cargo handling equipment.

While we are very interested in playing a key role in designing and administering the proposed Block Grant program, we are also, as previously noted, heavily engaged in project management and project execution activities. Critical elements of effective Project Management include: modeling routes and vehicle duty cycles; establishing vehicle and infrastructure requirements and specifications; assisting with procurements and manufacturing and construction activities, including quality control and quality assurance processes; managing project schedules to ensure timelines associated with vehicle and infrastructure rollouts are closely coordinated and timed to match; and assisting end users and local jurisdictions with the startup of advanced ZEV projects.

CTE appreciates your request for feedback on your draft solicitation concepts, and we trust that our suggestions will provide you with ideas for further consideration. We look forward to working with CEC as you refine your grant programs to facilitate the development of infrastructure that will support the commercialization and market acceptance of MD/HD ZEVs.

Sincerely,


Jaimie Levin
Director of West Coast Operations
(510) 851-0625
Jaimie@CTE.tv