

DOCKETED

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SoCalGas Comments on MDHD Blueprints

Additional submitted attachment is included below.



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California Energy Commission
Dockets Office, MS-4
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Subject: Comments on the Draft Solicitation Concepts for Blueprints for Medium- and Heavy-Duty Zero-Emission Vehicles (ZEV) and ZEV Infrastructure, Docket # 19-TRAN-02

Southern California Gas Company (SoCalGas) appreciates the opportunity to comment on the California Energy Commission (CEC) Draft Solicitation Concepts for Blueprints for Medium- and Heavy-Duty Zero-Emission Vehicles (ZEV) and ZEV Infrastructure (Docket # 19-TRAN-02). SoCalGas strongly supports the development of “Blueprints” as a useful tool to achieve mass scale adoption of alternative fuel technologies. To potentially improve the Draft Solicitation, SoCalGas would like to offer the following comments for consideration.

Blueprints Should Be Required to Be “Replicable”

As planning or guidance documents, it should be a requirement that work products be able to be replicated by a multitude of fleets or vocations, to the maximum extent feasible. In order to maximize the investments made into Blueprints, the more fleets that can benefit, the better. Blueprints overly specific to a certain fleet would only serve that one fleet. While it would be useful for that fleet, it would not support mass scale adoption.

The Draft Solicitation Should Clarify the Scale of the Blueprints

The Draft Solicitation requires available project level details which would support blueprints for individual or small-scale projects. However, the Draft Solicitations also requests details on working with community groups, community colleges and economic development stakeholders, as well as an analysis on the best mix of technologies for the region, which implies regional scale blueprints. The Draft Solicitation should clarify what is preferred or note that not all requirements would be pursued if they are not at an applicable scale. Examples of types of projects may provide better clarity.

Required Elements for Grid-Based Projects May Not Be Applicable for Hydrogen Projects

The Draft Solicitation requires Blueprints to analyze the combination of technologies and systems including innovative charging and Vehicle to Grid Integration. These requirements are specific to electric charging infrastructure and does not directly apply to hydrogen infrastructure. The Draft Solicitation should clarify which required elements are specific to a technology. Additionally, blueprints that explore multiple zero emission charging/fueling options (ie. both plug in and hydrogen) should get preferential funding.

The Draft Solicitation Should Look at a Local Energy “Ecosystem” to Improve Resiliency

Rather than prescribe grid integration technologies, CEC should explore tying vehicle infrastructure to local energy resiliency regardless of technology type to support local energy resiliency, particularly for disadvantaged communities. This would directly benefit communities where charging/fueling is located.

Thank you again for the opportunity to comment and we look forward to the Blueprint Solicitation being released.

Sincerely,



Kevin Maggay
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