

DOCKETED

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*Comment Received From: Zeem Solutions, Inc.
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Zeem Comments on 2021-2022 Investment Plan Update

Additional submitted attachment is included below.

September 30, 2021

California Energy Commission
516 Ninth Street
Sacramento, CA 95814-5512

RE: FY 2021-2022 California Energy Commission (CEC) Investment Plan Update for the Clean Transportation Program

Dear Clean Transportation Program Staff:

Zeem Solutions appreciates the opportunity to provide comments on CEC's FY 2021-22 Clean Transportation Program Funding Plan, particularly those initiatives in support of infrastructure deployment for small fleets and independent owner-operators of medium and heavy-duty vehicles converting to zero emission. Zeem supports the funding priorities exhibited in the "Investment Plan Update" and feel they strike the appropriate balance needed to address CEC's broader clean transportation goals while targeting emission reductions from small fleets and independent operators who comprise 90% of the California's medium and heavy-duty vehicles.

Zeem Solutions provides turn-key services to accelerate the deployment of M/HD ZEVs for commercial fleets throughout California, with a focus on supporting small fleets and independent operators. Zeem enables fleet operators to transition from diesel to zero-emission through cost-effective financing options, exchanging the high upfront capital expense of vehicle and infrastructure acquisition for an immediate operational savings, through a 3-5 year vehicle lease with a manageable, fixed monthly-rate covering the vehicle, charging, servicing, parking, energy storage, and reporting requirements for funding programs as an all-in-one solution. Zeem has a unique understanding of the challenges facing small fleets and has developed its service offering through detailed discussions with over 5,000 fleets across California – 94% of which have 100 or fewer vehicles and 60% of which have explicitly expressed interest in transitioning their fleets to commercial ZEVs.

We are encouraged that the CEC understands and acknowledges the many significant barriers small fleets face in transitioning to ZEVs including:

- the higher upfront capital expense for M/HD ZEVs and associated EVSE infrastructure
- small fleet owner-operator access to financing
- the time and resource challenges in navigating mandates and incentive programs
- impediments to deploying EVSE infrastructure relating to owner/tenant relationships or property and facility restrictions
- interruptions in operations due to the scheduling and timing of vehicle or infrastructure deployments

At a high-level, fleet operators are largely unfamiliar with ZEVs and understandably tentative if not overwhelmed about transitioning to new technologies and processes. Small fleets are characteristically very lean and can ill afford any trial-and-error mistakes, undue financial risk or timing disruptions to their business operations, even for a short period.

As the CEC develops the specific funding programs for FY 2021-2022, we respectfully request the CEC include fleet-as-a-service, charging-as-a-service and other third-party intermediary market solutions, as eligible entities to receive funding for both the EnergIZE program and competitive solicitations. Some third-party intermediaries who host multiple fleet's off-site charging, will be

aggregating infrastructure to maximize asset utilization and will be the customer of record for utility interconnections and services. We highlight these innovations and structures as there is often limited or no eligibility for third-party intermediaries in many state funding opportunities, yet they play a critical and necessary role in facilitating market transformation and achieving meaningful scale. Eligibility for intermediaries will help accelerate infrastructure deployments and charging utilization, while directly supporting small fleets and independent operators by removing risk while leveraging private capital and make-ready utility investments.

The alignment of CEC program incentive structures with market solutions such as “as-a-service” market solutions can help improve the overall cost-effectiveness and efficiency in meeting California’s near-term infrastructure deployment timelines for the forecasted adoption of M/HD ZEVs, as well as speed deployments, concentrate equity in disadvantaged areas, facilitate reporting, compliance and sector learnings. Zeem is poised to be a strategic partner and conduit for the CEC in this effort.

Again, Zeem appreciates the opportunity to provide comments on the FY 2021-22 Funding Plan for Clean Transportation Funding Program. We greatly appreciate the focus on medium and heavy duty and efforts to support small fleets and independent operators. We are glad to further discuss our comments and look forward to working together to support and accelerate small fleet ZEV adoption and infrastructure deployment.

Sincerely,

A handwritten signature in black ink, appearing to read 'PG', is written over the word 'Sincerely,'.

Paul Gioupis
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