

DOCKETED

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Tesla Comments - EnergIIZE Draft Implementation Manual

Additional submitted attachment is included below.

February 16, 2022

California Energy Commission
Re: Docket No: 21-TRAN-04
1516 Ninth Street
Sacramento, CA 95814

RE: Tesla Draft Implementation Manual Comments on Energy Infrastructure Incentives for Zero-Emission (EnergIIZE) Commercial Vehicle Program

Dear Commissioners, Energy Commission Staff:

Tesla appreciates the opportunity to provide feedback on the draft Implementation Manual (IM) for the EnergIIZE Program that was released on December 12, 2021, and the revision submitted on February 10, 2022. Throughout the program development process, Tesla has provided feedback on program design and implementation, some of which has been incorporated in the current draft IM. Tesla's engagement focuses mainly on charging needs of high-power medium- and heavy-duty (MHD) electric vehicles (EV) given the Tesla Semi, our Class 8 electric truck.

Some MHD electric vehicles will have significantly higher power charging needs compared to those of light-duty and low-power MHD vehicles, specifically as it relates to differing requirements for power level, domicile locations, duty cycles, and charge time. The IM, as currently drafted, only includes eligibility for low-power charging standards, available and used by primarily light-duty vehicles today. These charging standards are generally insufficient for high-power MHD vehicle needs and would resultingly restrict the effectiveness of electrifying MHD fleets, which are key to meeting greenhouse gas emission targets.

There are active standardization efforts within CharIN and SAE to develop an industry standard charging system that can adequately serve the power and charge time requirements of various MHD electric vehicle applications. Tesla is an active participant in these groups, which have stakeholders represented from the whole value chain of the MHD industry, from vehicle manufacturers, to charging providers, government agencies, and utilities. There are already early versions of these high-power chargers available in the market given the urgent need from MHD fleet customers for charging solutions beyond what is standardized today.

The IM is unclear in its eligibility pathway of equipment capable of high-power charging prior to it becoming either an official standard or validated equipment by a utility. To meet state MHD electrification targets, particularly for Class 7-8 vehicles and drayage trucks, EnergIIZE should include a clear pathway for eligibility of chargers capable of supporting high-power MHD vehicle needs. Without such an eligibility pathway, the CEC may inadvertently fund chargers that will become stranded assets and will slow down the adoption of MHD charging solutions capable of serving high-power MHD vehicle needs.

Tesla appreciates the opportunity to provide feedback on the draft Implementation Manual for the EnergIIZE Program. We look forward to continued collaboration between stakeholders, participants, CALSTART, and the CEC on future iterations of the EnergIIZE Program requirements in order to best support medium- and heavy-duty vehicle electrification.

Sincerely,



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