

**DOCKETED**

<b>Docket Number:</b>	17-EVI-01
<b>Project Title:</b>	Block Grant for Electric Vehicle Charger Incentive Projects
<b>TN #:</b>	243163
<b>Document Title:</b>	Zeem Solutions Comments - CALeVIP Comments
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Zeem Solutions
<b>Submitter Role:</b>	Applicant
<b>Submission Date:</b>	5/19/2022 2:33:29 PM
<b>Docketed Date:</b>	5/19/2022

*Comment Received From: Zeem Solutions  
Submitted On: 5/19/2022  
Docket Number: 17-EVI-01*

**Zeem Solutions CALeVIP Comments**

*Additional submitted attachment is included below.*

May 19, 2022

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

RE: CALeVIP 2.0 Public Workshop

Dear CALeVIP Program Staff:

Zeem Solutions appreciates the opportunity to provide comments on CALeVIP 2.0 Public Workshop. Zeem supports initiatives that aid in the infrastructure deployment for medium- and heavy-duty vehicles converting to zero emission alternatives.

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. For example, we exchange the high upfront capital expense of vehicle and infrastructure acquisition for an immediate operational savings through vehicle leasing 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. Additionally, Zeem depots offer opportunity charging contracts to non-resident fleets which increases utilization of the infrastructure, especially during daytime hours when resident fleets are typically on the road. Our first depot is in Inglewood, CA near the LAX airport and has been operational since December 2021.

We recommend that zero emission commercial vehicle infrastructure projects serving multiple companies also be eligible for CALeVIP 2.0 funding.

- This aligns with the definition of eligible projects in Infrastructure Investment and Jobs Act (IIJA) under PUBLIC LAW 117-58—NOV. 15, 2021 135 STAT. 1423, “funds made available under this paragraph in this Act shall be for projects directly related to the charging of a vehicle and only for electric vehicle charging infrastructure that is open to the general public or to authorized commercial motor vehicle operators from more than one company”.
- The site requirements in CALeVIP 1.0 section 5C in the Southern California Implementation Manual state that a site must be “available 24 hours per day, year-round with the chargers publicly accessible. EV chargers cannot be located behind a fence or in a gated parking lot closed to the public after hours”. This requirement is challenging for infrastructure providers who serve commercial fleets. Charging EVSE for M/HD vehicles is often secured behind a fence to prevent vandalism and theft. Additionally, commercial vehicle operators are more likely to plan their charging in advance which minimizes the need for 24 hours per day, year-round access compared to passenger vehicles. Consequently, charging providers can plan charging sessions in advance, maximize charger utilization and efficiency, and prevent operational inefficiencies caused by unexpected visits.



In direct response to the question posed during the workgroup meeting on DCFC Rebate Tiers, we recommend that staff adopt Option 2 (50kW to 149kW; 150kW to 249kW; 250kW+). High-kW DCFC charging will be needed for M/HD vehicles and the incentive structure should account for the higher cost of these chargers.

Zeem appreciates the opportunity to provide comments on the CALeVIP 2.0 Public Workshop. We welcome the opportunity to discuss our comments further and look forward to working collaboratively to support and accelerate zero emission infrastructure deployment

Sincerely,

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