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TeraWatt Comments on the CEC Clean Transportation Investment Plan 22-23

Additional submitted attachment is included below.



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October 25, 2022

California Energy Commission

TeraWatt Comments in Response to 2022-2023 Investment Plan Update for the Clean Transportation Program

Docket No. 22-ALT-01

TeraWatt Infrastructure (TeraWatt) appreciates the opportunity to submit these comments to the California Energy Commission (CEC) on the Revised Staff Report for the 2022-2023 Investment Plan Update for the Clean Transportation Program, docketed on September 29, 2022, to inform how the CEC will guide the allocation of program funding for the Fiscal Year 2022-2023 and the first six months of Fiscal Year 2023-2024.

TeraWatt Infrastructure was established to provide solutions for large-scale electric vehicle charging required to meet the unique needs of large commercial fleets. Whether for an urban mobility hub, a last mile fleet operator, or long-haul electric trucking, TeraWatt brings the talent, capabilities, and capital to create reliable, cost-effective solutions for customers on the leading edge of the transition to zero-carbon transport.

TeraWatt offers comments in support of several **Targeted Projects for Medium- and Heavy-Duty ZEV Infrastructure:**

- 1. Truck Parking EV Charging and Hydrogen Refueling:** TeraWatt supports funding for projects to provide charging infrastructure and parking for independent owner operators and long-haul and regional-haul drivers, with funding made available to both the parking space allocation and charging equipment and installation. Given the varied vehicle types and use cases, funding should allow for multiple types of charging infrastructure. The project should focus on DC fast charging equipment in order to serve fast charging needs

of some vehicles as well as slow DC charging for vehicles with longer dwell times, similar to the transit bus use case or overnight charging for Class 4-8 vehicles. Beyond these, TeraWatt encourages that funding eligibility is not restricted to single fleet operator locations or require vehicle procurement as a condition of the funding to support third-party EV charging infrastructure providers business models.

2. Warehouse and Regional Trucking: TeraWatt believes that the warehouse and regional trucking segment is an incredibly important market for electrification. Given the importance of ports to long-haul and regional distribution, and last-mile delivery, TeraWatt recommends the inclusion of eligibility for near-port sites. TeraWatt is supportive of the ability for sites to serve multiple fleets to maximize charger utilization and increase access to charging infrastructure. With that in mind, project eligibility requirements should not include vehicle procurement metrics or be restricted to single fleet operators.

3. Mobility-as-a-Service Models: TeraWatt strongly supports funding for projects that provide charging as a service models, and further supports including the distinction of electric-fueling as a service models for project eligibility. Many fleet operators looking to electrify their vehicles lack the experience and expertise to implement and manage charging infrastructure to support their electrification plans. Funding for as-a-Service models will accelerate the electrification of medium- and heavy-duty fleets by supporting charging providers' ability to invest in charging infrastructure and partner with fleet operators before the vehicles are in use. As we have stated previously, funding eligibility should be independent of vehicle lease and/or purchase requirements.

4. Large-Scale Ultra-Fast Charging Stations: TeraWatt strongly supports the CEC's funding of projects to accelerate the buildout of large-scale ultra-fast charging stations, which are associated with extremely high upfront costs. Given the large power requirements necessary to serve these sites, funding should be made available to not only the EVSE equipment, but also include the customer-side make-ready infrastructure, battery storage, and other on-site DERs that will be used as part of the overall site optimization for EV charging. In addition, TeraWatt strongly recommends the CEC make funding for these

projects available to a variety of use cases including but not limited to metropolitan hubs, corridor charging centers, locations near ports, airports and logistics centers. The CEC should also ensure applicant eligibility does not include a requirement for vehicle lease or purchase.

TeraWatt applauds the Staff and Advisory Committee for their continued innovation, support and engagement on the Clean Transportation Program to date and looks forward to the establishment of the 2022-2023 Funding Plan to further develop and deploy clean transportation technologies to help attain California's emission reduction goals.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anthony Harrison', with a stylized flourish at the end.

Anthony Harrison

Head of Government and Regulatory Affairs

TeraWatt Infrastructure

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