

DOCKETED

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Daimler Truck North America Comments

Additional submitted attachment is included below.

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October 25, 2022

California Energy Commission
715 P Street
Sacramento, CA 95815

RE: Daimler Truck North America (DTNA) Comments on FY 2022-2023 California Energy Commission (CEC) Investment Plan Update for the Clean Transportation Program

Dear California Energy Commissioners and Staff,

DTNA appreciates the opportunity to provide input on CEC's proposed FY 2022-23 Clean Transportation Program Investment Plan and supports the proposed investments for zero-emission vehicle (ZEV) infrastructure. However, in light of the California Public Utilities Commission's (CPUC) 10/14/22 Proposed Decision, DTNA is concerned the pace of infrastructure investment may not be on track with the pace of zero emission vehicle adoption required by CARB's Advanced Clean Trucks (ACT) and Advanced Clean Fleets (ACF) rules.

DTNA is the largest manufacturer of Class 6-8 vehicles in the United States and is a leading provider of comprehensive products and technologies for the commercial transportation industry. Through our brands: Freightliner, Western Star, Thomas Built Buses, Freightliner Custom Chassis Corp., and Detroit Powertrain, DTNA is the North American leader in designing, engineering, manufacturing, and marketing medium- and heavy-duty trucks, school buses, vehicle chassis, and associated technologies and components.

DTNA is fully committed to electrifying our fleet of commercial vehicles. We recognize that these technologies play a significant role in the future of commercial transportation and are vital to reducing NOx and GHG emissions. We currently offer battery electric school buses, walk-in van chassis (Class 4), as well as heavy-duty (Class 8) trucks for sale, and we are preparing for the market introduction of an all-electric medium-duty (Class 6/7) truck.

DTNA supports the proposed investments outlined within the draft Clean Transportation Program Investment Plan, specifically the proposed multi-year allocations for infrastructure to support medium- and heavy-duty vehicles, as an initial investment. Along with the investments being made by the Air Resources Board to support vehicle deployment, this funding will be critical to providing the infrastructure needed to support successful deployments of commercial medium- and heavy-duty vehicles throughout the state.

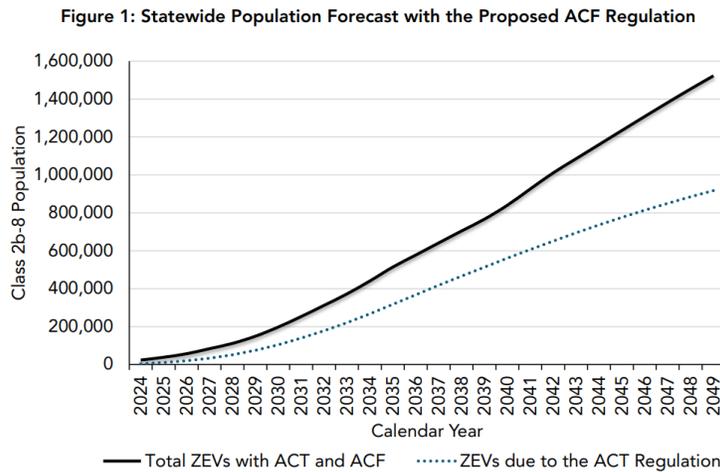
DTNA, in partnership with Portland General Electric (PGE), is proud to have built the first-of-its-kind public charging island for commercial ZEVs in Portland, Oregon. Fleets are expected to utilize a spectrum of charging solutions that include both behind-the-fence depot charging and

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en-route public charging. While depot fueling is a common practice today, this paradigm may shift if fleets are not able to install behind-the-fence charging equipment due to cost or infrastructure constraints. Ensuring commercial vehicles have public access to charging stations will extend ranges from depots and allow ZEVs to serve broader parts of the community. Commercial ZEVs are available today in a variety of chassis configurations, but fleet adoption continues to be stalled by the long lead time required for front-of-the-meter grid updates and the lack of available charging infrastructure at depot locations.

DTNA is concerned that the pace of infrastructure investment, while moving in the right direction, is not on track to keep pace with the ambitious volumes of zero emission medium- and heavy-duty vehicles required in California by the ACT and ACF rules. DTNA recommends the CEC work more closely with the CPUC and the utilities to ensure grid capacity is planned for, constructed, and aligned with CARB's ACT and ACF regulations, which are expected to drive significant Class 2b – Class 8 demand in the immediate future¹.



Class 2b – Class 8 trucks will require power ranging from 20 kW to 1+ MW, often concentrated in relatively small areas around existing depot facilities. DTNA recommends that the CEC continues to work collaboratively with fleets and vehicle OEMs to further develop targeted, site-specific plans that will ensure infrastructure readiness to meet the demands of the ACT and ACF rules.

Finally, DTNA respectfully requests the inclusion of investments to support innovative charging models that include the ability for combined light-duty and medium- and heavy-duty publicly accessible charging solutions to support fleet adoption across all sectors. Key aspects to consider for publically accessible dual purpose charging infrastructure: (1) at least one pull-through charging lane to accommodate all vehicle classes, (2) wide ingress and egress to support medium- and heavy-duty vehicle maneuverability, (3) minimum charging speed of 150 kW to support larger batteries, and (4) ability for the dedicated pull-through site to have the ability to support future charging rates of at least 1 MW on one port in anticipation of wide deployment of the MCS standard.

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DTNA again greatly values this opportunity to support and provide input on CEC's proposed Clean Transportation Investment Plan update for FY 2022-2023. We look forward to continuing to work with the CEC and other stakeholders towards our shared mission of accelerating the deployment of zero-emission vehicles and infrastructure in California.

Sincerely,



Sean T. Waters
Vice President, Compliance and Regulatory Affairs
Daimler Truck North America

References:

1. The California Air Resources Board (August 30, 2022). *Staff Report: Initial Statement of Reasons*.
<https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2022/acf22/isor2.pdf>