

**DOCKETED**

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*Comment Received From: Adam Browning  
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## **Forum Mobility Comments**

*Additional submitted attachment is included below.*



California Energy Commission  
715 P Street  
Sacramento, CA 95815

October 25, 2022

RE: Fiscal Year 2022-2023 California Energy Commission Investment Plan Update for the Clean Transportation Program

Dear California Energy Commissioners and Staff,

Forum Mobility ("Forum") provides zero-emission trucking solutions for drayage in California. Forum develops, builds and operates the charging infrastructure, purchases and leases the class 8 zero-emission electric trucks, and wraps all the costs and incentives into one monthly fee for truck drivers or fleet owners. We appreciate the opportunity to provide input on the Fiscal Year 2022-2023 California Energy Commission (CEC) Investment Plan Update for the Clean Transportation Program.

The CEC recently prepared an analysis pursuant to Assembly Bill 2127, referenced in the October 6 Advisory Committee meeting, that indicated the necessary charging for medium and heavy-duty ("MHD") battery electric vehicles ("BEV") would require about \$6.2 billion in capital expenditure (not including land and operating costs) by 2030. If the proposed California Air Resources Board Advanced Clean Fleets regulation is implemented, California will need to install an average of 53 medium and heavy duty (MHD) BEV chargers every day, through 2030, to adequately serve the electric fleets. From 2030 to 2045, an average of 229 MHD chargers will need to be installed every day.

The EnergIIZE program needs to be enhanced to meet the scale of these challenges. Specifically:

- More funding for each EnergIIZE lane
- Each EnergIIZE lane should be available at least twice per year to match project development cycles
- EnergIIZE funding lane caps should be lifted, and the funding should be apportioned by application size, making the funding impactful for large charging applications.

**More funding.** The 2022-2023 Investment Plan includes historically large amounts of funding for BEV charging infrastructure - and that is much appreciated. However, California's ambitions

for zero-emission transportation have increased as well, and funding support for critical infrastructure should continue apace.

**Increase number of grant cycles.** EnergIIZE currently offers four (three for BEV, 1 for hydrogen) funding lanes. At this time it appears that each funding lane will be opened once a year. Given the eligibility requirements to maximize funding potential, one application window per year is not conducive with project development timelines. Forum recommends that funding opportunities be opened at least twice per year to match project development cycles. Doing so will better match the business realities of companies working to develop the charging infrastructure necessary to achieving California's ambitious ZEV goals.

**Change project funding caps.** Funding caps should be lifted, and funding should be apportioned by project size to meet the needs for large-scale charging installations. Forum notes that charging infrastructure investments for MHD is vastly different from light duty in that in many cases, stand-alone land needs to be acquired, lengthy electrical interconnection processes need to be undertaken and substantial entitlement documentation needs to be obtained. For drayage, approximately 80% of drivers are independent owner operators - they need a secure location to charge their trucks overnight. To do this cost-effectively, it must be done at scale.

For reference, a charging facility to serve approximately 100 drayage trucks can easily have a capital cost in excess of \$14MM. The \$500,000 to \$750,000 cap on EnergIIZE allocations (pending project eligibility) severely limits the program's effectiveness for larger projects. Alternatively, if funding were apportioned by project size, the funding would be much more efficient on a per kW basis.

We appreciate the opportunity to provide input on your crucial work, and look forward to further collaboration to achieve California's zero-emission transportation goals.

We'd be happy to discuss in further detail at any time. I may be reached at [abrowning@forummobility.com](mailto:abrowning@forummobility.com) and 510.520.0630.

Yours,

Adam Browning  
Boardmember for Forum Mobility