| DOCKETED | |
|---|---|
| **Docket Number:** | 22-EVI-05 |
| **Project Title:** | National Electric Vehicle Infrastructure (NEVI) Funding Program |
| **TN #:** | 247965 |
| **Document Title:** | Prologis Comments on California's NEVI Program |
| **Description:** | N/A |
| **Filer:** | System |
| **Organization:** | Prologis |
| **Submitter Role:** | Public |
| **Submission Date:** | 12/7/2022 7:18:12 AM |
| **Docketed Date:** | 12/7/2022 |

*Comment Received From: Prologis*
*Submitted On: 12/7/2022*
*Docket Number: 22-EVI-05*

## Prologis Comments on California's NEVI Program

*Additional submitted attachment is included below.*

December 7, 2022

Ms. Patty Monahan
Commissioner
California Energy Commission
715 P Street
Sacramento, CA 95814

Dr. Toks Omishakin
Secretary
California State Transportation Agency
400 Capitol Mall, Suite 2340
Sacramento, CA 95814

RE: Docket #: 22-EVI-05, National Electric Vehicle Infrastructure (NEVI) Funding Program

Dear Commissioner Monahan and Secretary Omishakin:

Prologis, Inc. (Prologis) appreciates the opportunity to provide comments to the California Energy Commission (CEC) and California State Transportation Agency (CalSta) on the state's Deployment Plan for the National Electric Vehicle Infrastructure (NEVI) Program and development of electric vehicle (EV) charging networks within California.

Headquartered in San Francisco, CA, Prologis is the world's leading owner, operator and developer of industrial real estate, focused on global and regional markets across the United States, the Americas, Europe and Asia. Prologis leases sustainably designed, modern logistics facilities to a diverse base of approximately 5,800 customers, which include manufacturers, retailers, transportation companies, third-party logistics providers and other enterprises. Our expertise is manifested through a comprehensive suite of solutions we offer our customers that help drive down energy usage, invest in renewable energy, and support decarbonization of supply chains.

Prologis is empowering its customers in their transition to a zero-emissions vehicle future, offering retrofit and build-to-suit vehicle electrification projects across last-mile and heavy-duty applications. Having previously completed electric vehicle and charging infrastructure deployments throughout priority markets in California, the Prologis team is well qualified to successfully implement projects which will improve air quality in our community and expand small business access to electric vehicles.

We understand California's initial phase of the NEVI program will focus on light-duty charging needs. Prologis wants to emphasize the need for an integrative network of both light-duty and medium- and heavy-duty (MD/HD) focused battery electric charging stations to support in the transition to a zero-emission transportation future. Prologis believes the electrification of logistics fleets is critical to the future of commerce. As such, we are committing our talent and capital to advance this capability and offer new solutions for customers across the state. We hope to collaborate at the state and local level to help achieve a quick and effective deployment of EV infrastructure for MD/HD vehicles across California that builds on existing logistics networks and works in concert with community partners to advance state objectives.

As California builds out its NEVI plans, Prologis wants to encourage additional phases of the program to focus on deployment of MD/HD zero-emission infrastructure. We urge California to carefully evaluate opportunities and tradeoffs among infrastructure solutions before identifying incentive allocations or other priorities among market segments or technologies. Our primary suggestion to overcome barriers to MD/HD fleet EV infrastructure is to actively engage real estate owners and prioritize deployment of EV infrastructure at or near warehouses, accordingly. We also encourage California to identify gaps in infrastructure and funding, including potential discrepancies between infrastructure in various utility

jurisdictions, and support projects that can help close those gaps.

With this in mind, we respectfully submit the following comments for consideration that we believe will further improve the development of EV infrastructure in the state and reduce the probability of unexpected barriers and delays to electrification. Our recommendations are built around the major themes of flexibility, speed, and reliability. Please find these below.

## Specific Recommendations

1. **Support integrated and resilient energy solutions to connect to MD/HD EV infrastructure.** A barrier to overcome for widespread electrification is that the electric utilities are often unable to provide sufficient electricity to power a MD/HD EV charging system within reasonable time frames. Legal, labor, and supply chain issues, often outside of a utility's control, all contribute to power not being delivered to a site in a timely manner. In addition, the high demand placed on the grid by MD/HD EV charging raises the risk of power outages. To combat this, Prologis has developed zero and near zero emissions electricity generation solutions that enable vehicles to charge on site. This will lower emissions, improve site resiliency, and increase the reliability of MD/HD EVs. On-site self-generation should be an accessible tool in the toolkit to make electrification possible.

2. **Consider various payment mechanisms based on user needs.** Prologis clients look for payment solutions that fit them. To enable customers to have the flexibility they need to run their businesses, Prologis will need to be able to charge customers in a variety of ways, including via subscription for fleet customers, a per kWh fee, or a fee for time spent in the charging parking space. This will be key for small businesses and fleets who might utilize a charging site.

3. **Consider real estate owners as key partners in accelerating MD/HD EV market development.** A major issue for the industry is the lack of ownership and property control by developers of charging station sites, which can cause significant delays in the permitting and installation processes. To reliably and speedily electrify MD/HD EVs throughout California, charging developers should be required to either own the property or prove control in order to be granted state funds. Owning your charging site is key to guaranteeing that the developers have a long-term commitment and interest in making sure that the charging is reliable and well-maintained, and the site is built quickly.

4. **Support flexibility in infrastructure technologies.** Prologis knows that the technology to support commercial charging is rapidly evolving. We pay close attention to technological changes that might make our sites more reliable, efficient, user-friendly, and effective. For example, Approved Products Lists (APL) for EV chargers can delay projects for months or even years due to significant backlogs at testing laboratories and funding agencies. These lists can harm electrification efforts by mandating outdated equipment or preventing projects from being completed. Therefore, we recommend technological flexibility be part of any program of funding for new infrastructure for a wide array of applicants, including private entities.

## Conclusion

Prologis is committed to being a national leader in the advancement of zero-emission vehicles and charging infrastructure technology in logistics and goods movement. We look forward to working with the

CEC and CalSta on NEVI Program implementation and other initiatives to advance MD/HD vehicle electrification in California.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Alexis Moch
Director, Government Affairs
amoch@prologis.com