

**DOCKETED**

<b>Docket Number:</b>	19-TRAN-02
<b>Project Title:</b>	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
<b>TN #:</b>	249700
<b>Document Title:</b>	Penske Truck Leasing Co., L.P. Comments - on Staff Workshop on Potential Solicitation for MDHD Charging and Refueling Infrastructure on Corridors
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Penske Truck Leasing Co., L.P.
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	4/14/2023 4:15:21 PM
<b>Docketed Date:</b>	4/14/2023

*Comment Received From: Penske Truck Leasing Co., L.P.*  
*Submitted On: 4/14/2023*  
*Docket Number: 19-TRAN-02*

**on Staff Workshop on Potential Solicitation for MDHD Charging and Refueling Infrastructure on Corridors**

*Additional submitted attachment is included below.*



April 14<sup>th</sup>, 2023

California Energy Commission (CEC)  
715 P Street  
Sacramento, CA 95814

**RE: Public Comments Submitted for California Energy Commission’s Potential Solicitation for Medium- and Heavy-Duty Charging and Hydrogen Refueling Infrastructure Projects on Designated Corridors**

To Whom It May Concern:

Thank you for the opportunity to provide comments on the California Energy Commission’s (CEC) Potential Solicitation for Medium- and Heavy-Duty Charging and Hydrogen Refueling Infrastructure Projects on Designated Corridors. Penske Truck Leasing Co., L.P. ("Penske") is a nationwide leader in low/zero-emission transportation and has made a company-wide commitment to a deliberate and responsible transition to zero emission vehicles (ZEVs). We are submitting comments specifically regarding the development of a definition for “public” refueling.

**Background**

As one of the nation's leading transportation solutions providers, Penske shares the CEC's zero-emission goals. Our commitment to a shift to zero emission transportation technology is reflected by our investments over the last five years in multiple medium- and heavy-duty electrification demonstration and deployment projects. These projects have afforded Penske invaluable experience working with the CEC, California utilities, major vehicle manufacturers (including startups), charging infrastructure manufacturers and developers, battery providers, and customers in the deployment and operation of new zero emission transportation services across the entire supply chain.

We believe there are very few, if any, large transportation providers doing more than Penske to advance zero emission (ZE) infrastructure technology and policy. Penske currently operates one of the largest commercial fleets of medium- and heavy-duty zero emission vehicles in the United States with battery electric powered trucks from multiple original equipment manufacturers (OEMs). Many of these ZEVs are operated and maintained out of numerous Penske sites in California, which are fully equipped with medium- and heavy-duty electric vehicle (MHDEV) charging infrastructure. In addition to our current sites, we are now in the planning, and development stages to expand our charging network that will allow us to advance our, our customers’, and the communities our vehicles operate in shared ZE goals.

Penske's growing expertise with ZEVs, coupled with our comprehensive understanding of charging infrastructure and real-world commercial fleet applications, uniquely positions us to be a resource for the CEC for front-line information on the availability, use, and application of charging equipment to support medium- and heavy-duty ZEVs, and enables us to serve as a partner in the CEC's efforts to implement incentive programs targeting effective and reliable deployments of charging infrastructure across the state.

On behalf of the entire Penske team, we want to thank the CEC and your staff for engaging with us for a potential medium- and heavy-duty charging and refueling infrastructure incentive program. We



appreciate the time CEC staff have invested to hear our concerns and find a way forward that addresses our recommendations while maintaining the goals of CEC. We believe that through engagements like the ones we have had over the past few years, the CEC can set a nation-wide standard for funding charging and refueling infrastructure.

#### **“Public” Fueling**

**The public fueling requirement is currently not defined in the proposed solicitation and was posed for discussion during the recent staff meeting on March 28, 2023. As the MHDEV market continues to take form, this is an incredibly important topic for discussion, and Penske would like to provide guidance into the definition of public charging for your consideration.**

Penske has a unique role within the market that enables a built-in customer base for MHDEV charging. As a leading global transportation services provider Penske’s operational model allows businesses access to MHDEVs and the required charging infrastructure; access that might not otherwise be achievable. As many of Penske’s customers are small businesses, Penske is uniquely positioned to support the expansion and uptake of ZE transportation technology across the industry.

Penske’s continued development of charging infrastructure to support their rental fleet of publicly accessible EVs aligns with the intent and goals of the CEC. Charging equipment deployed by Penske will be accessible to our customers, allowing for shared fleet charging in a regularly maintained, safe environment. While Penske’s charging equipment is not publicly available 24/7, members of the public will be able to rent ZEVs from Penske and subsequently utilize the chargers. Penske’s model supports a multi-fleet, shared fleet refueling opportunity, which guarantees utilization, ensures ongoing maintenance and reliability, and provides a convenient opportunity for MHDEVs across weight classes and sectors. Penske strongly believes a shared approach for refueling creates greater fleet certainty and speaks to the early needs of fleet electrification to ensure access and a reliable charging experience.

While the traditional public charging model for passenger vehicles has been shown to be a necessity for the accelerated adoption in that market, an equivalent “public” definition for the MHDEV market would ignore that fact that the majority of these duty-cycles over the next few years will only include return-to-base charging. The challenges, complexities, and technologies affecting MHDEV operations all point to encouraging open/public access of charging infrastructure in a controlled system that ensures affordability, reliability, and full support from an expert team. The shared “public” definitions of the traditional passenger EV model and our proposed EV plus charging accessibility model will ensure the MHDEV charging ecosystem optimally develops to meet California’s goals and market demands.

**Corridor funding will be incredibly important, but for the current MHDEV market and available technologies, it may not be an approach that the industry should solely prioritize for this program. Penske would like to encourage the CEC to adopt a shared-fleet definition of public charging, whereas infrastructure will be considered public access if utilized by multiple fleets and any customers, consumer or commercial, for its ZEV infrastructure funding programs. This is in alignment with the direction of many MHDEV operators who look to guarantee capacity for customers (which is tough to do under a public access model), ensure equipment uptime, and**



maximize utilization. This is also in alignment with recent federal guidelines and Carl Moyer Program Infrastructure guidelines.

When fleets choose Penske for their clean vehicle needs, it is analogous to hiring an experienced in-house alternative fuels team. The fleets we work with in California are eager to replace their older vehicles with EVs, but require the necessary, affordable infrastructure access. We are interested in working with the CEC to advance the adoption of cleaner vehicle technologies. To that end, we would like to set up a call with your team to discuss the concerns described above. Please contact me to do so at [dean.stapleton@penske.com](mailto:dean.stapleton@penske.com).

Sincerely,

A handwritten signature in black ink, appearing to read "D Stapleton", with a horizontal line extending to the right.

Dean Stapleton  
Senior Manager, Alternative Fuels  
Penske Truck Leasing  
610-796-5256  
Dean.Stapleton@penske.com