

**DOCKETED**

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<b>Project Title:</b>	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
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*Comment Received From: Zeem Solutions  
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**Zeem COmments**

*Additional submitted attachment is included below.*



April 14, 2023  
California Energy Commission  
715 P Street  
Sacramento, California 95814

**Docket #: 19-TRAN-02 Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure**

Zeem Solutions (Zeem) appreciates the opportunity to provide comments on Docket #: 19-TRAN-02 following the California Energy Commission (CEC) workshop to support fleets, independent owner-operators, and the parties that serve them.

Zeem provides long-term leasing, servicing, maintenance, parking, charging, and energy storage at our shared depot facilities for light-, medium-, and heavy-duty fleet vehicles. We open our charging infrastructure to all fleets (including light-duty commercial fleets) on a contract-charging basis. Our mission is to transform the way fleets operate by providing an affordable solution for zero emission transportation that improves air quality within our communities. Zeem enables small fleets that have previously been unable to access support, especially those in underrepresented communities, to accelerate the adoption of zero-emission transportation as well help California meet its zero-emission vehicle (ZEV) and climate goals.

**Medium- and Heavy-Duty ZEV Refueling Infrastructure**

We recommend that zero emission commercial vehicle infrastructure projects serving multiple companies also be eligible for funding through this program. We also encourage staff to allow, but not require, charging infrastructure to be shared between light-, medium-, and heavy-duty vehicles.

This aligns with the definition of eligible projects in the Infrastructure Investment and Jobs Act (IIJA) under PUBLIC LAW 117-58—NOV. 15, 2021 135 STAT. 1423, “funds made available under this paragraph in this Act shall be for projects directly related to the charging of a vehicle and only for electric vehicle charging infrastructure that is open to the general public or to authorized commercial motor vehicle operators from more than one company”.

Requirements that chargers be available 24 hours per day, year-round where chargers cannot be located behind a fence or in a gated parking lot closed to the public after hours is prohibitive for infrastructure providers who serve commercial fleets. Charging EVSE for medium- and heavy-duty vehicles is often secured behind a fence to prevent vandalism and theft. Additionally, commercial vehicle operators are more likely to plan their charging in advance, which minimizes the need for 24 hours per day, year-round access compared to non-commercial vehicles. Consequently, charging providers can plan charging sessions in advance, maximize charger utilization and efficiency, and prevent operational inefficiencies caused by unexpected visits. Zeem Solution’s customers arrive at our depot at the start of their shift and pick up a fully charged and operational vehicle. At the end of the driver’s shift, they drop off the vehicle and Zeem takes care of everything in between. Zeem’s depot coordinators are onsite 24/7 to optimally charge vehicles and perform daily inspections, vehicle washes, preventative maintenance, and more.



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Thank you for the consideration of our comments. We look forward to continuing to work with CEC staff in the future to improve air quality through cleaner transportation.

Sincerely,

**Nick Raspanti**

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