

DOCKETED

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Forum Mobility Comments on Potential Solicitation

See attached.

Additional submitted attachment is included below.



April 14, 2023

California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Staff Workshop on Potential Solicitation for Medium and Heavy-Duty Charging and Hydrogen Refueling Infrastructure Projects on Designated Corridors

Dear Energy Commission Staff,

Thank you for the opportunity to provide feedback on the recent workshop on a potential solicitation for medium and heavy-duty (MHD) charging and hydrogen refueling infrastructure projects on designated corridors. Forum Mobility (Forum) supports the proposed funding concept and strongly supports the CEC's efforts to support electrification and eliminating mobile emissions from MHD trucks.

Forum, headquartered in Oakland, California, is a developer, owner and operator of heavy-duty charging infrastructure and a buyer and lessor of class-8 battery electric vehicles (BEV). Forum's mission is to accelerate the deployment of zero-emission drayage trucks throughout California. Many smaller fleets and independent owner operators face barriers to zero-emission vehicle adoption, including, the high up-front cost of infrastructure and vehicles, the lack of suitable site control, the availability of sufficient electrical power and the complexities of installing the charging infrastructure. Forum helps overcome these barriers to adoption by offering reliable and economical charging infrastructure, as well as attractive leasing options of class-8 zero-emission electric trucks. Forum secures the available incentives and passes them along to the truck driver or fleet owner. Forum provides a one-stop solution for 'charging as a service' and/or 'truck as a service' via a subscription-based monthly fee. With upwards of 20 charging depots in various stages of development around the ports of Oakland, Long Beach, and Los Angeles, and along corridors to common freight destinations, Forum is meeting the call for zero-emission transportation.

The transition to zero-emission drayage by 2035 is not without significant hurdles. For example, Forum estimates that approximately 2,200 MHD chargers will have to be installed per year to serve 30,000 drayage BEVs by 2035. This sustained deployment will require about 3,000 acres of land to be utilized for charging while creating over 2,500 megawatts of new electrical demand – more power than what is produced by the Diablo Canyon nuclear plant. Together, Forum forecasts a need for \$9 billion in new truck investment, \$10 billion in real estate investment and \$2 billion in new charger investment, totaling over \$21 billion in new investment to meet California's 2035 zero-emission drayage goals.

To help support needed investment and accelerate the deployment of zero-emission drayage trucks, particularly for small fleets and independent operators, Forum respectfully submits the following comments on the potential solicitation:

- **Public Accessibility** – Infrastructure up-time and utilization are critical to the success of the BEV transition. In the case of MHD, owner/operators and fleets need safe, secure, and guaranteed space to reliably charge their vehicles and therefore be able to consistently operate their business. The infrastructure must be dedicated to specific customers and schedulable. The MHD space is unique in that it also incorporates high-voltage electricity and big-rig vehicles operating

in confined spaces. Equipment utilization, driver training, site ingress/egress and site transit patterns all require special consideration and specialized training to ensure safe environments. To ensure the safety and security of users, these operations are best conducted in areas purpose built for and accessible by qualified participants. - Therefore, we suggest that the definition of “publicly available” account for site access that is better reflective of the operational realities of MHD.

- Charging Locations - Regarding potential limitations on locating chargers, we recommend the CEC consider allowing a sufficient range/proximity to a corridor. Identifying sites with adequate power availability, sufficient real estate, and applicable zoning all within close proximity to priority corridors is exceedingly difficult. If a geographic distance limit for applicable sites proximate to the corridors is to be included in the solicitation, we suggest a distance of 4 miles from designated corridors to provide enough flexibility for site selection.
- Additional Corridors – Forum notes that the I-580 and I-205 corridors in Northern California are not designated as applicable routes for the solicitation. CEC should consider including these two key routes given their importance to the Port of Oakland and distribution centers in Tracy. The I-580 and I-205 corridors also serve as key connections to the Manteca, Lathrop and French Camp distribution centers and class-8 truck parking along the I-5 corridor.

Forum appreciates CEC consideration of this proposed funding concept. Programs like this will be needed to support electrification along the state’s congested freight corridors and will help carry out the goals and requirements of the Advanced Clean Fleet regulation and state’s ZEV deployment objectives. Thank you again for the opportunity to provide our comments and support for the proposed funding solicitation. We look forward to continuing to work with staff to establish a successful freight corridor charging program.

Sincerely,

WILL MITCHELL
VICE-PRESIDENT
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