

DOCKETED

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Recommendations for upcoming Municipal Charging GFO

Additional submitted attachment is included below.

August 3, 2023

California Energy Commission
715 P Street
Sacramento, California 95814

Re: Docket #20-TRAN-04—Municipal EV Charging Station GFO

Frontier Energy, Inc. has been working with City and County fleets throughout California to develop their plans for transitioning to zero-emission vehicles (ZEVs.) We applaud the Energy Commission for recognizing that municipal fleets need the certainty of a dedicated funding source to help them with the costs of installing charging infrastructure for their fleets.

In response to the questions and ideas posed by staff during the pre-application workshop on July 21, 2023, Frontier offers the following observations.

Funding and Eligibility

- Several of the fleets that Frontier supports lease their vehicles and/or use a fleet services provider. We suggest that the eligibility include fleet operators in addition to owners.
- Many smaller municipalities do not have their own permitting department. Permitting is handled by the County, another city, or through some other arrangement. We recommend not using streamlined permitting as an eligibility requirement or scoring criteria.
- Most municipalities must submit a competitive bid contract for procuring and installing charging stations. They cannot include vendors on a project team for a grant application. Consider changing this requirement so that it encourage projects that have implementation plans, cost analysis, and identified project sites.
- Some municipalities' codes include fleet fueling requirements to ensure that all vehicles are ready for emergency preparedness and response. They can't share charging stations with employees or the public until they amend the code. We recommend not using public access as a scoring criterion.
- Because many municipal departments rely on medium-duty pickup trucks and SUVs, we recommend that project-funded chargers should be for light- and medium-duty vehicles.
- If CEC chooses to use categories for "small" and "large," we suggest using the size of the municipality based on U.S. Census figures or the municipalities' reported revenue from the [California State Controller's Office](#) instead of number of vehicles.

We also suggest that CEC consider municipal utilities, CCAs, and rural co-ops applying for funding on behalf of their municipal clients. Smaller cities in particular do not have the experience or resources to submit a grant proposal. The utility could use the funding to perform electrical capacity upgrades that would enable the fleet to install the charging stations.

Proposed DAC/LIC Requirements

Frontier works with fleets in California urban, rural, remote, and agricultural areas of the state. Every municipality has residents and businesses that fall below the poverty line, struggle to keep their doors open, and have unmet needs. Consider allowing the rural counties that CARB identified in the Advanced Clean Fleets regulation to be exempt from the 50% DAC/LIC requirement.

Technical and Operational Requirements

Fleet-only charging stations may operate differently than public charging stations. A few items to consider:

- We recommend omitting the operational requirement for two reasons:
 - Municipalities have many other reasons to keep charging stations operational. They have requirements to serve their constituents and build in redundancy and back-up systems to meet those service level requirements.
 - Many of our clients purchase warranty and maintenance contracts from the vendor, and still have downtime for weeks because the vendor can't diagnose the problem, obtain a part, or dispatch a technician. This is especially true in rural and remote counties.
- Some cities prefer non-networked charging stations for all or part of their fleet because the capital and operational costs are much lower, and they do not require (or want) the data from smart chargers. Networking should not be a requirement.
- Municipal fleets often plan to integrate the charging stations into the software platforms that they already use for fleet inventory, maintenance, and fueling. Behind-the-fence, fleet-only charging stations should not be required to be OCPP compliant.

Proposed Data Collection

The proposed data collection is appropriate for public charging stations. Fleets are looking for different data points that this project is well-suited to collect:

- Total cost of installation, including utility upgrades, materials, and parking lot upgrades.
- Type and form of back-up power. (Nearly all municipalities must have emergency back-up power for all fleet fueling.)
- Hours of charging station use and average charging time (or kWh per session) by vehicle vocation (e.g., police vehicle, public works truck, CCTV van).
- Reliability, maintenance costs, frequency and cause of outages.
- Method of charging departments/users for kilowatts and comparison of actual cost to charge and revenue from department charge-backs.

Thank you for this opportunity to provide feedback that will help craft a GFO that municipal fleets throughout the state need to assist with the transition to zero emission vehicles.

Sincerely,



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