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DTNA Comments on Proposed Tracker Tool

Additional submitted attachment is included below.

DAIMLER TRUCK
North America

August 8th, 2023

Hannon Rasool
Fuels and Transportation Division
California Energy Commission
715 P Street
Sacramento, California 95814

Re: Comments in Response to Electric Vehicle Infrastructure Project Tracker Workshop

Daimler Truck North America (DTNA) submits the following comments in response to CEC's workshop on an Electric Vehicle Infrastructure Project Tracker tool.

DTNA is the largest producer of medium- and heavy-duty (MHD) vehicles in North America. DTNA is fully committed to supporting the emerging zero-emission vehicle (ZEV) market; we expect these technologies to play a significant role in the future of commercial transportation, and know they are a vital contributor to lowering NOx and GHG emissions. DTNA is investing heavily in the development of electric vehicles. We currently offer battery electric school buses, walk-in van chassis (Class 5/6), as well as heavy-duty (Class 8) trucks for sale, and we are preparing for the market introduction of an all-electric medium-duty (Class 6/7) truck. DTNA – in partnership with Portland General Electric (PGE) – is proud to have built the first-of-its-kind public charging island for commercial ZEVs in Portland, Oregon. In addition, DTNA launched a joint venture focused on public charging & refueling (Greenlane) to help in the acceleration of infrastructure that meets the needs of MHD vehicles. Finally, DTNA has an expert eConsulting team dedicated to supporting fleets with all aspects of the ZEV transition, including site design and interfacing with utilities. Therefore, DTNA is uniquely positioned to offer insights into MHD transportation electrification (TE).

DTNA believes the successful transition to ZEV transportation will require a three-part "transformation equation"[1].

Vehicle Technology x Cost Parity x Infrastructure = Successful Transformation

Manufacturers have vehicle technologies available today suitable for a variety of fleet applications. A number of state and federal incentive programs exist to help fleets achieve cost parity. However, the infrastructure factor remains effectively zero, jeopardizing this transformation, the ability of obligated parties to meet CARB regulatory requirements, and the State of California's carbon reduction targets.

DTNA commends CEC for recognizing the challenge of tracking delays in the planning, permitting, construction, and energization processes. DTNA supports CEC's stated goals to collect data and

[1] https://www.youtube.com/watch?v=eY76BzcxeFc

identify bottlenecks in this process, and includes the following recommendations for CEC.

DTNA recommendations for the proposed Tracker tool

- DTNA believes that reporting this information in the tracker tool should not fall entirely to the grantee, commercial vehicle fleets in the case of EnergIIZE. In working with fleet customers installing EV infrastructure in California, DTNA has found fleets are often unable to access this information in real-time due to communication inefficiencies with AHJs and utilities. DTNA strongly recommends that AHJs and the utilities be responsible for inputting their relevant data for these projects, encouraging better transparency, accountability, and collaboration.

- DTNA believes all communities and utilities must participate in this data collection project. CEC should make no exemptions for any AHJs, IOUs, or POUs.

- DTNA recommends CEC prioritize data collection for projects with capacity requests >2 MW, which are generally excluded from IOUs interconnection timeline programs, regardless of whether or not they are CEC funded.

DTNA recommends accelerating the timeline of the proposed Tracker

DTNA agrees with CEC's assessment that delays in these processes present barriers to meeting the State of California's zero-emission vehicle and infrastructure goals. DTNA is concerned that the proposed timeline for developing this tool remains unaligned with the State's carbon reduction timeline and regulatory landscape, with key milestones highlighted below:

- 2024 – ACT and ACF implementation begins
- 2025 – *Proposed Tracker implementation*
- 2026 – ACCII implementation begins
- 2035 – All drayage trucks must be ZEVs, all new passenger cars must be ZEVs
- 2036 – All on-road commercial vehicles sold must be ZEVs
- 2042 – All ACF fleets (high priority/federal and state/local government) reach 100% ZEV phase-in requirement

The Advanced Clean Trucks (ACT) regulation phases in increasing percentages of Class 2b-8 ZEV sales volumes, beginning January 1, 2024. Based on average annual new truck registrations in California, DTNA estimates approximately 3,500 Class 2b-8 commercial ZEVs will be sold in California in 2024, requiring a rapid build out of supporting infrastructure. CEC should be collecting data during this timeframe to identify early issues and bottlenecks.

For ACT implementation alone, DTNA estimates California utilities will need to add 8,959 MW of capacity by 2035. Assuming the current distribution grid is at capacity today, the annual capacity increase needed to support ACT ZEV deployment is shown in the table below. Beginning in 2036, all on highway Class 2b-8 vehicles sold in California must be ZEVs. DTNA estimates this will require an additional 2,340 MW of capacity be added per year for 2036 and beyond until the California fleet is fully converted to ZEV. By 2042, this amounts to approximately 25,339 MW.

Annual Capacity Increase Required to Support ACT ZEV Deployment in California

Year	New Capacity (MW)
2024	151
2025	198
2026	259
2027	393
2028	552
2029	711
2030	870
2031	987
2032	1,104
2033	1,174
2034	1,244
2035	1,314
2036+	2,340

In addition to DTNA's projections, the International Council on Clean Transportation[2] estimates these demands on a geographic basis, and projects commercial vehicles will consume 11,196 MWh daily by 2030. California has also adopted the Advanced Clean Fleets regulation and Advanced Clean Cars II regulation, generating additional time-bound demand for EV projects. DTNA believes bottlenecks and solutions must be identified early in order to keep the state on track with this rapid expansion in TE.

DTNA is concerned that the proposed Q1 2025 full launch to begin data collection fails to capture early implementation data, and it is unclear whether meaningful reforms can be implemented in time to serve later major milestones, as the CPUC and IOUs are not obligated to address issues or implement solutions identified in this data collection exercise. DTNA recommends CEC launch a data collection tool by end of 2023, to begin data collection in Q1 2024, synchronized with CARB's ACT and ACF regulations and. DTNA strongly recommends that solutions are identified in parallel to publication of this data.

[2] https://theicct.org/wp-content/uploads/2023/05/infrastructure-deployment-mhdv-may23.pdf

Response to specific questions posed by CEC staff:

What timeline data is appropriate to collect?

DTNA supports CEC Staff's proposal to collect the following information:

- AHJ permit submittal date
- AHJ permit approval/denial date
- Utility application submittal date
- Utility final design date
- Developer construction start and complete dates
- Energization date
- Reasons for permit denial or other project non-completion

However, DTNA believes that reporting this information in the tracker tool should not fall entirely to the grantee, commercial vehicle fleets in the case of EnergIIZE. In working with fleet customers installing EV infrastructure in California, DTNA has found fleets are often unable to access this information in real-time due to communication inefficiencies with AHJs and utilities. DTNA strongly recommends that AHJs and the utilities be responsible for inputting their relevant data for these projects, encouraging better transparency, accountability, and collaboration.

Staff did not indicate what background information would be displayed in the tracker tool, but DTNA recommends that relevant information that may impact timelines, like total site capacity, be included and displayed.

How frequently should data be reported? As project stages are completed, or on a quarterly basis?

If CEC's goal is near real-time tracking as discussed in the workshop, DTNA recommends reporting occur as project stages are completed or on a monthly basis. However, as noted above, DTNA has heard from fleets there is often a communication lag from AHJs and utilities when projects encounter delays and the reasons are not always apparent to the grantee. For the most complete and up-to-date reporting, AHJs and utilities should input their own data into the tracker tool in real-time.

DTNA is concerned that placing this reporting burden entirely on grantees will not have the intended effect of increasing transparency, and instead deter fleets from using the tool and applying for EnergIIZE funding.

Should timeline data be summarized at the county level, or displayed for each individual CEC funded EV charging project site?

Because each site is unique and timing will depend on the scope of the project, DTNA believes aggregating this data at the county level may not allow for trend analysis where different AHJs

are involved. DTNA recommends staff consider aggregating statistics on the zip code level, as it may more accurately align with AHJ boundaries.

DTNA also recommends CEC make individual site information available and filterable, so that more specific trends can be analyzed. DTNA is concerned that data relevant to commercial vehicle sites, which are fewer in number but require more capacity, may be lost if lumped in with many smaller passenger car sites. For example, if one zip code has 9 CAL eVIP site projects with AC charging <2 MW that are served on an IOUs 135 day interconnection program, but 1 EnergIIZE 5MW commercial vehicle site ineligible for that program that is not served for 24+ months, reporting average timing is not as insightful for commercial vehicle fleets.

Would an automated noticing feature speed project timelines? Are there other bottlenecks a noticing system could solve?
DTNA supports the concept of an automated noticing feature if all utilities and AHJs are actively participating in using the tool and inputting their own data in real-time.

Summary

DTNA supports CEC's stated goals and concept proposals for the EV Infrastructure Tracker tool. DTNA strongly encourages CEC to revisit the timeline to more appropriately align with the State's carbon reduction goals and vehicle regulatory timeline. DTNA also recommends utilities and AHJs collaboratively enter data, instead of leaving it the sole responsibility of a funding program grantee.

DTNA thanks CEC for the opportunity to provide feedback on the proposed Tracker and looks forward to continued collaboration to enable widespread transportation electrification.

Sincerely,

Alissa Recker
Engineer, Compliance & Regulatory Affairs