

DOCKETED

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**Forum Mobility Comments In Response to Draft Staff Report
Tracking California's Electric Vehicle Chargers**

Additional submitted attachment is included below.



California Energy Commission Docket Unit, MS-4

Docket No. 22-EVI-04

715 P Street

Sacramento, California 95814

October 25, 2023

RE: 22-EVI-04 and Electric Vehicle Charging Infrastructure Reliability - Comments In Response to Draft Staff Report Tracking California's Electric Vehicle Chargers

Dear California Energy Commission Staff,

Thank you for the opportunity to provide feedback on the California Energy Commission's (CEC) draft staff report on electric vehicle charging infrastructure.

Forum Mobility, headquartered in Oakland, California, provides turn-key zero-emission trucking solutions to help accelerate the deployment of zero-emission drayage trucks throughout California. Many smaller fleets and independent owner operators face barriers to adoption, including awareness of zero-emission vehicle options, the high up-front cost, navigating the incentive programs, and installing or accessing the necessary fueling infrastructure. Forum helps overcome these barriers to adoption by developing, building and operating the charging infrastructure, as well as purchasing and leasing class 8 zero-emission electric trucks – with the ability to secure available incentives to pass along to the truck driver or fleet owner. Forum provides a one-stop solution for a monthly fee for 'charging as a service' and/or 'truck as a service.' We are currently developing depots in and around the ports of Oakland, Long Beach, and Los Angeles, and along corridors to common freight destinations for drayage operators.

We have signed on to the letter submitted by EVCA. We'd like to raise some additional issues and recommend some additional solutions.

The EVSE sector for medium and heavy duty vehicles is still nascent, with a large and growing number of providers trying to advance technology in vehicles, chargers, and communications. There is a public interest in encouraging innovation, as it is necessary to improve EV capabilities. Our concern is that overly strict downtime parameters will be incorporated into the DNA of grant funding terms and conditions, and subsequently will add investment risk, making the building and financing of next generation MHD charging depots harder and more expensive. To this point, we recommend that serial defects be addressed in downtime exclusions. A serial defect could be defined as "Serial Defect means a manufacturing, material or design defect of a substantially identical nature, which reasonably be expect to result from the same cause, that has occurred to fifteen percent (15%) or more of the Units of the Facility." We propose two ways of dealing with serial defects that would promote prompt amelioration and long term reliability while not raising additional difficulties in building and financing next generation charging stations:

- 1) The MHD charging station operator could be given the opportunity to cure serial defects, in conjunction with the manufacturer before downtime accrued.
- 2) A MHD charging station operator could be given a six month grace period to work out operability issues before the clock starts on reliability reporting.

Thank you for the opportunity to provide input.

Yours,

Adam Browning
EVP, Forum Mobility