

**DOCKETED**

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## **Volvo Group Comments on California's NEVI Deployment Plan**

*Additional submitted attachment is included below.*

2024-03-25

Jimmy O'Dea

Assistant Deputy Director, Transportation Electrification

California Department of Transportation

Ben De Alba

NEVI Lead

California Energy Commission

**Re: California's National Electric Vehicle Infrastructure Deployment Plan Development**

Dear All,

Volvo Group North America ("Volvo Group") welcomes the opportunity to provide comments to the California Energy Commission (CEC) and Caltrans regarding its implementation of the federal NEVI Formula Program. We applaud the CEC and Caltrans for your vision and leadership in infrastructure planning for zero-emission (ZE) vehicles in California.

Volvo Group has spent years developing complete solutions for electromobility, and today – in North America – we are selling five configurations of the Volvo VNR Class 8 Electric<sup>1</sup> truck, the Mack LR Electric<sup>2</sup> waste hauler, the Mack MD Electric<sup>3</sup> work truck, and five electric Volvo Construction Equipment models<sup>4</sup>. As one of the country's leading providers of zero-emission infrastructure and transport solutions – Volvo Group offers its perspective as an active participant in the ZE transportation sector.

During the March 12 workshop on the NEVI program, staff indicated that "per our reading" of the federal program there was no exclusion of medium- and heavy-duty (M/HD) infrastructure funding, but that the state chose to focus on light-duty (LD) applications. We would argue strongly that it is quite important to support M/HD infrastructure in that it is critical to not just the growth of transportation electrification, but fundamental to the deployment and operation of commercial electric vehicles. This is because of their higher power charging requirements and almost complete inability to take advantage of any existing electric charging infrastructure. Unlike the LD market, commercial fleets regulated under the California Air Resources Board's Advanced Clean Fleets Rule (ACF) are required to purchase and put into use the ZE trucks manufacturers

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<sup>1</sup> <https://www.volvotrucks.us/trucks/vnr-electric/>

<sup>2</sup> <https://www.macktrucks.com/trucks/lr-series/lr-electric/>

<sup>3</sup> <https://www.macktrucks.com/trucks/md-electric/>

<sup>4</sup> <https://www.volvoce.com/global/en/our-offer/emobility/>

must build to meet CARB's Advanced Clean Trucks (ACT) Rule. Those rules are active now, so given the long timeframe for infrastructure deployment, investment delays could threaten the success of the regulation.

Next, the State has outlined the M/HD need for charging in the AB 2127 studies documented at the CEC. Respectfully, we are falling behind in meeting those needs as of today. In addition, a greater M/HD focus within NEVI would also address the equity issue in disadvantaged communities.

The success of California's M/HD infrastructure development is critical to the success of meeting the state's goal of deploying 172,000 ZE trucks by 2030. Commercial vehicles will not be able to replace the current internal-combustion-engine vehicles without a plentiful, reliable public charging infrastructure network. This is an unprecedented opportunity to leverage federal funding and – given California's own budget constraints – it behooves the state to use NEVI funding to address infrastructure priorities across the board in all sectors as much as possible. One avenue might be to allow or even encourage multi-use facilities to replicate the current liquid fueling experience.

The Volvo Group appreciates Caltrans and CEC's efforts on this front, and we stand ready to work with you and other state agencies, and the rest of the industry to transition to ZE freight solutions in the Golden State.

Kind regards,



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### **About the Volvo Group**

Volvo Group drives prosperity through transport and infrastructure solutions, offering trucks, buses, construction equipment, power solutions for marine and industrial applications, financing and services that increase our customers' uptime and productivity. Founded in 1927, the Volvo Group is committed to shaping the future landscape of sustainable transport and infrastructure solutions. The Volvo Group is

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headquartered in Gothenburg, Sweden, employs almost 100,000 people and serves customers in more than 190 markets. North America is a major market for the Volvo Group, employs more than 17,000 people, and operates 10 manufacturing and remanufacturing facilities in seven U.S. states, as well as three plants in Canada and one in Mexico.

In California, the Volvo Group and its dealers employ more than 1,000 people with locations in Costa Mesa, Mountain View, Corona, Hayward, Fontana, Stockton, Fresno and La Mirada. Volvo Group is in the process of training and certifying dealers to sell and service its electric products. Currently three dealers in California have been certified with more expected to be added soon.