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*Comment Received From: Daimler Truck North America  
Submitted On: 4/5/2024  
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## **DTNA Comments on 2024 IEPR Scoping Order**

*Additional submitted attachment is included below.*

# DAIMLER TRUCK

## North America

April 5, 2024

California Energy Commission  
715 P Street  
Sacramento, CA 95814

### **Re: Docket # 24-IEPR-01 Draft Scoping Order for the 2024 IEPR Report Update**

Daimler Truck North America (DTNA) submits the following comments in response to the Notice of Request for Comments on the Draft Scoping Order for the 2024 Integrated Energy Policy Report (IEPR) update.

DTNA is the largest producer of medium- and heavy-duty (M/HD) 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 medium-duty (Class 6/7) and heavy-duty (Class 8) tractors for sale. 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 M/HD 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”<sup>1</sup>.

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 Feedback on the IEPR Process**

DTNA commends CEC for the IEPR process, and we have appreciated the opportunity to engage with staff for transportation electrification energy forecasting. We believe issuing an accurate energy forecast is paramount to the state’s climate and carbon reduction goals, and enabling the state’s transportation electrification policies and regulations. With major near-term ZEV

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<sup>1</sup> <https://www.youtube.com/watch?v=eY76BzcxFe>

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deployments required to keep pace with the California Air Resources Board's Advanced Clean Trucks (ACT) and Advanced Clean Fleets (ACF) regulations, DTNA recommends CEC revisit AATE3 within this proceeding due to the short timeframe that was allotted during the 2023 IEPR process.

During the 2023 IEPR process, staff covered high level changes during the Public Workshops, but detailed assumptions were not made available until the end of the year, when it was too late to engage on substantive changes. DTNA has two key areas of concern that we believe result in CEC significantly underestimating the energy needs of M/HD transportation electrification:

- Specific assumptions around vehicle energy usage, in particular the assumed daily vehicle miles traveled (VMT) for specific vehicle use cases.
  - During follow up conversations with staff, it became clear that some M/HD usage assumptions are incorrect. Staff assumes <100 miles per day for some Class 8 vehicle classes. We believe these low usage assumptions do not accurately reflect the segments that are required to electrify under the ACF regulation, nor do they capture the way fleets use their trucks.
- Specific assumptions around M/HD load shapes, charging times, and the ability to offset peaks with solar generation.
  - Within the utility-specific forecasts, it became evident CEC assumed significant M/HD charging would be offset by solar generation, resulting in a significant decrease in the energy and peak demand forecasts. However, peak solar generation hours coincide with business hours when most fleets are operating their vehicles. This assumption was not made clear until the utility-specific forecasts were made available in January.

Because the accuracy of this forecast is critical to enable the state to meet its zero-emission vehicle deployment requirements, we strongly encourage the Commission to consider feedback on AATE3 within the scope of this docket. We further recommend these process changes to best enable stakeholder feedback:

- Forecast details should be made available as early as possible (with the October draft) so that stakeholders can provide feedback for consideration
- More details around key assumptions should be shared in the Public Workshops
- Utility-specific forecasts should be made available earlier in the process, prior to January adoption
- The Commission should release more detailed geographical energy needs forecasts beyond the utility forecasts to address specific areas where M/HD vehicles congregate and produce highly localized distribution needs. These distribution capacity gaps need immediate attention to address the state's rapid transportation electrification transition.
- Staff presentations for Public Workshops should be made available 2-3 business days in advance, so stakeholders can better prepare questions and feedback for discussion.

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We thank the Commission for consideration of these comments and look forward to participating in the 2024 IEPR process.

Sincerely,

A handwritten signature in black ink, appearing to read "Alissa Recker", with a long horizontal flourish extending to the right.

Alissa Recker  
Engineer, Compliance & Regulatory Affairs