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*Comment Received From: Greenlane Infrastructure, LLC  
Submitted On: 5/28/2024  
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**Greenlane Infrastructure, LLC**

Please see attached comments.

*Additional submitted attachment is included below.*



May 27, 2024

Mr. Ben De Alba  
CEC NEVI Team Lead  
715 P. Street  
Sacramento, CA 95814

Dear Mr. De Alba,

Thank you for the opportunity to provide feedback on California's National Electric Vehicle Infrastructure (NEVI) deployment plan to the California Energy Commission (CEC) and California Department of Transportation (Caltrans). This limited time federal formula funding provides a crucial opportunity to fund charging infrastructure to promote transportation electrification and meet the state's ambitious climate targets.

Greenlane Infrastructure, LLC (Greenlane) is an independent joint venture (JV) founded by Daimler Truck North America, LLC (DTNA), NextEra Energy Resources, LLC (NEER), and BlackRock Alternatives (BlackRock) to design, develop, install, and operate a nationwide, high-performance, public charging and hydrogen fueling network for medium and heavy-duty (MHD) zero-emission vehicles (ZEVs). As part of Greenlane's commitment to providing an exceptional driver experience, each station will feature important amenities including food and beverage offerings, restrooms, and Wi-Fi lounges, as well as renewable energy resources, and smart energy management technologies to maximize efficiency and uptime.

Greenlane respectfully offers the following feedback to improve California's NEVI program and achieve desired climate and air quality outcomes:

- **Publicly accessible MHD commercial vehicle charging projects should be eligible for funding in the remaining rounds of California's NEVI program, beginning with Round 2.** In order for the Advanced Clean Truck and Advanced Clean Fleet regulations to be successful, a robust network of publicly accessible charging hubs is critical for zero emission truck adoption. Installation of public MHD charging hubs will also allow for commercial vehicle routes to expand beyond return-to-base operations and serve all freight corridors within the State. In the CEC's recently published 2nd AB 2127 Report, to support the anticipated 155,000 zero-emission trucks by 2030, the CEC projects that 5,500 publicly accessible chargers will be needed. By accepting and funding MHD infrastructure projects beginning in Round 2 of California's NEVI program, deployment of publicly accessible MHD chargers in California will be accelerated. While there are multiple funding opportunities set to open or reopen in 2024 for publicly accessible MHD ZEV infrastructure projects, many more are needed to meet the anticipated demand of MHD ZEV drivers. The CEC and Caltrans can help meet that demand by opening NEVI funding up for MHD projects in Round 2.
- Connector and charger sizes should be flexible to accommodate a range of commercial MHD ZEV applications, including but not limited to CCS-1 and a minimum of 150kW per charger. If the CEC and Caltrans impose additional restrictions beyond the federal requirements on connectors and charger sizes, new solutions may be restricted from competing in future rounds of NEVI.



- **Funding levels should be appropriate for public MHD charging sites** which can be an order of magnitude more expensive than light duty charging sites, due to space and grid infrastructure requirements to serve MHD trucks. Depending on the size of the site and power required, an example range of \$5M-\$10M per site in grant funding, or 60-70% of eligible project costs covered, would attract the most competitive and dynamic projects.
- For MHD charging projects to be successful under NEVI, Greenlane recommends not using “Group 1” and “Group 2” eligibility requirements proposed during the “Joint Workshop on Concepts for the 2<sup>nd</sup> Solicitation under California’s NEVI Formula Program” on March 12, 2024. The two-part project concept would block MHD projects from being proposed under future rounds of NEVI due to the restrictive nature. While some LD charging station owners may already have a diverse enough real estate portfolio in California the same cannot be said for MHD charging station owners. MHD charging locations have a multitude of additional restrictions and complications that will be very difficult if not impossible to meet those requirements for comprehensive coverage on key freight routes.

With NEVI program funding, we can accelerate the deployment of MHD ZEV stations and vehicle adoption, curb greenhouse gases, accrue air quality benefits to communities who need them most and highlight California's leadership in clean transportation. We welcome further discussion about California NEVI program funding and how it can help us achieve our shared vision for a zero-emission freight future.

Thank you for your consideration,

Andrea Pratt  
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