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DTNA Comment on NEVI Workshop

Additional submitted attachment is included below.

DAIMLER TRUCK
North America

May 28, 2024

Emily Belding
Caltrans

Jim McKinney
California Energy Commission

Re: Joint Workshop for the 2024 NEVI Deployment Plan Update Docket 22-EVI-03

Daimler Truck North America (DTNA) submits the following comments in response to the Joint Workshop held by Caltrans and CEC on May 10, 2024.

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 significantly 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, suitable for local pickup and delivery. In addition, DTNA, along with NextEra Energy and BlackRock, has formed a joint venture, Greenlane, focused on nation-wide commercial public charging and hydrogen refueling in the future to help accelerate infrastructure that meets the needs of M/HD vehicles. Finally, DTNA offers Detroit eFill, a charging solution designed for efficiency and compatibility, and has an expert eConsulting team dedicated to supporting fleets with all aspects of the ZEV transition, including site design and interfacing with utilities.

Electrifying Commercial Vehicles is a Clear State Policy Priority

To achieve the greatest environmental benefit, electrifying medium- and heavy-duty vehicles and building resilient charging infrastructure is a clear California policy priority. Executive Order N-79-20 outlines the State's zero-emission vehicle goals, including 100% M/HD vehicles by 2045 where feasible, and 100% ZEVs by 2035 for drayage trucks. In accordance with this Executive Order, CARB has adopted regulatory requirements for both OEMs and fleets, requiring the sale and acquisition of commercial ZEVs.

Infrastructure plans that primarily focus on the needs of light-duty vehicles will not support the requirements of medium- and heavy-duty vehicles and will slow the electrification of the commercial fleet. DTNA strongly urges Caltrans and CEC to use the remaining NEVI funds to accelerate build out of M/HD sites in California, consistent with the State's climate goals and Federal Highway Administration's NEVI Formula Program Guidance.

Left: Example of MHD vehicle attempting to utilize existing EV infrastructure catering only to light-duty passenger vehicles. Right: Successful implementation of dual purpose pull-though charging infrastructure able to accommodate all vehicle classes at Portland's Electric Island.

Public Charging Infrastructure Catering to Commercial Vehicles Must be Available

Fleets are expected to utilize a spectrum of charging solutions that include both behind-the-fence depot charging and en-route public charging. While depot fueling is a common practice today, this paradigm may shift if fleets are not able to install behind-the-fence charging equipment due to cost or infrastructure constraints. Ensuring commercial vehicles have public access to charging stations will extend ranges from depots and allow ZEVs to serve broader parts of the community. Commercial ZEVs are available today in a variety of chassis configurations, but fleet adoption continues to be stalled by a lack of available charging infrastructure.

CEC's latest AB 2127 report indicates California will need 109,000 depot chargers and 5,500 en route chargers to support medium- and heavy-duty ZEVs in 2030[1]. Likewise, CTC's SB 671 Clean Freight Corridor Efficiency Assessment found that 22 public BEV stations are needed by 2025, increasing to 236 by 2030 under the Balanced Adoption Scenario[2]. DTNA strongly recommends California leverage the NEVI Formula program to help accelerate the near-term installation of charging infrastructure for commercial vehicles. The eligible corridor groups already identified include numerous critical freight corridors where commercial ZEVs are likely to be deployed in the near-term, if the infrastructure is in place to support it.

Recommendations for Accommodating Commercial Vehicles in NEVI Plans

While Title 23 Part 680 of the Code of Federal Regulations does not explicitly outline standards for medium- and heavy-duty charging station requirements, DTNA believes nothing within these standards and requirements precludes Caltrans and CEC from using funds for M/HD stations. The Federal Highway Administration's NEVI Formula Program Guidance explicitly includes

[1] https://www.energy.ca.gov/publications/2024/assembly-bill-2127-second-electric-vehicle-charging-infrastructure-assessment

[2] https://catc.ca.gov/-/media/ctc-media/documents/programs/sb671/092523-sb671-draft-assessment-a11y.pd

medium-duty and heavy-duty EV charging infrastructure as eligible. DTNA recommends Caltrans and CEC convene a stakeholder workshop specifically to gather input on site specifications from industry experts that have experience building M/HD stations in California, including vehicle OEMs, fleets, charging-as-a-service providers, and charging hardware providers.

DTNA also notes that M/HD sites can be inclusive of passenger cars, but the inverse is not always true. Using dual purpose pull-through charging lanes will ensure that all vehicle classes including truck-trailer combinations can be served in addition to light-duty vehicles. Higher charging speeds are necessary to support larger batteries in commercial vehicles. Additional weighting or consideration should be given to site proposals that address the following:

- **Proximity to freight corridors and major distribution hubs.** Sites serving areas with high freight traffic volumes should receive priority funding.
- **Future-proofing measures for speeds up to 1.5 MW.** DTNA recommends the pull-through site be planned for future charging rates.
- **Wide ingress and egress.** For safety and ease of use, DTNA recommends that points of entry and exit are designed with medium- and heavy-duty vehicle maneuverability in mind.
- **Longer cable lengths and flexible charger locations.** Serving the commercial fleet will require longer cable lengths and strategic charger placement to reach charging ports on a wide variety of chassis configurations.

Conclusion

California's ZEV refueling infrastructure is not on track to meet the demands of the medium- and heavy-duty market. DTNA strongly urges CEC and Caltrans to use the remaining NEVI funds to develop sites that can meet the needs of M/HD ZEVs. DTNA believes various stakeholders are prepared to provide guidance to the agencies on site specifics that meet all federal requirements.

Sincerely,

Sean T. Waters
Vice President, Compliance and Regulatory Affairs