DOCKETED	
Docket Number:	22-EVI-03
Project Title:	National Electric Vehicle Infrastructure Deployment Plan Development, 2022-26 for CEC and Caltrans
TN #:	256571
Document Title:	Voltera Comments Regarding the 2024 Update to the National Electric Vehicle Infrastructure Plan
Description:	N/A
Filer:	System
Organization:	Voltera
Submitter Role:	Public
Submission Date:	5/28/2024 5:09:18 PM
Docketed Date:	5/29/2024

Comment Received From: Voltera
Submitted On: 5/28/2024
Docket Number: 22-EVI-03

Voltera Comments Regarding the 2024 Update to the National Electric Vehicle Infrastructure Plan

Voltera Power LLC (â€œVolteraâ€) is pleased provide these comments to the California Energy Commission (CEC) and California Department of Transportation (Caltrans) regarding the 2024 update to the National Electric Vehicle Infrastructure (NEVI) Plan.

Please reach out to me with any questions or for clarification regarding this correspondence.

Thank you,

Paul Hernandez

Additional submitted attachment is included below.

voltera

May 28, 2024

Jim McKinney
CEC Project Manager
California Energy Commission
715 P Street
Sacramento, CA 95814

Re: 22-EVI-03: Voltera Comments Regarding the 2024 Update to the National Electric Vehicle Infrastructure Plan

Submitted electronically to docket@energy.ca.gov

Dear Mr. McKinney,

Voltera Power LLC ("Voltera") is pleased provide these comments to the California Energy Commission (CEC) and California Department of Transportation (Caltrans) regarding the 2024 update to the National Electric Vehicle Infrastructure (NEVI) Formula Program Plan. Voltera responds to questions posed during the May 10, 2024 workshop. Voltera applauds CEC and Caltrans for their continued leadership on the NEVI Program and provides the following recommendations regarding programmatic adjustments that will support the next phase of the program.

About Voltera

Voltera designs, builds, operates, and maintains infrastructure for fleets and branded charging networks — all of which are challenged in the current market to find viable off-premises charging solutions. Voltera solves these challenges, developing, owning, and operating the infrastructure that enables customers to fully transition to zero emission vehicles (ZEVs) at speed and succeed with them at scale.

Voltera provides a charging infrastructure as a service (ClaaS) model. ClaaS is a turnkey solution that includes site identification and acquisition, site development, hardware deployment, operations, and maintenance. With plans to invest significant capital and a team with deep experience deploying charging assets, proven critical infrastructure expertise and key strategic partners, Voltera is well positioned to help solve the EV infrastructure challenge and enable scaled zero-emission transportation. Voltera's customers span from rideshare to drayage fleets, and our business strategy seeks to accelerate the transition to ZEVs by addressing infrastructure challenges inhibiting the adoption of ZEVs — notably including those affecting drayage trucks.

Recently, Voltera opened its first Class 8 drayage charging depot in the Los Angeles region. The project is Voltera's first scaled truck site with 65 installed high-powered DC fast chargers (DCFC). Most recently Voltera announced plans for additional facilities near the Ports of Savannah, and Long Beach and Los Angeles, with support from the Federal Highway Administration. Further, Voltera has purchased properties throughout California to support light, medium and heavy-duty (M/HD) people and goods movement. In February Voltera announced the acquisition of 19 ZEV infrastructure development sites since August 2022, bringing Voltera's portfolio to 21 sites, representing over $150 million of private investment in ZEV infrastructure real estate and over 115 megawatts (MW) of planned charging capacity, with projects across California, Arizona, Texas, Georgia, and Florida.[1]

Comments

Voltera is actively monitoring NEVI and similar programs, with the intention to explore how these programs can help accelerate the deployment of infrastructure to support our customers and partners. We encourage the CEC and Caltrans to consider making the following adjustments to the program, to more closely align it with the on-the-ground realties faced by ZEV infrastructure stakeholders.

1. *What are your organization's recommendations on how to use the remaining NEVI funds?*

Voltera encourages the CEC and Caltrans to use NEVI funds to prioritize investments in ZEV infrastructure in support of stakeholders that are mandated to electrify. These mandates exist across multiple fleet sectors, as light, medium, and heavy duty fleets must meet electrification targets. For the light duty sector, transportation network companies (TNCs) are compelled to electrify consistent with achieving 100% electric vehicle miles traveled (eVMT) by 2030 under the Clean Miles Standard.[2] For the M/HD sectors, Innovative Clean Transit,[3] Advanced Clean Trucks[4] and Advanced Clean Fleets[5] regulations have established clear mandates to achieve ZEV targets. While these targets are in place, it is mission critical to rapidly accelerate infrastructure deployment in a manner that achieves state objectives for these sectors. Voltera believes that NEVI can serve as an important program to help enable stakeholders to achieve the goals and comply with the mandates of the Clean Cars II, Clean Miles Standard, Innovative Clean Transit, Advanced Clean Trucks and Advanced Clean Fleets regulations. Voltera recommends that the CEC and Caltrans continue to solicit light duty (LD) projects, but expand project eligibility to include projects that support (together or separately) both LD and M/HD fleets.

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[1] Reference: Voltera Solutions, EV Charging and Infrastructure Services. Website Access: https://www.volterapower.com/solutions
[2] Website Access: https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2021/cleanmilesstandard/fsor.pdf
[3] Website Access: https://ww2.arb.ca.gov/our-work/programs/innovative-clean-transit/about
[4] Website Access: https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-trucks-fact-sheet
[5] Website Access: https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-fleets-regulation-summary

2. *Should medium and heavy-duty truck charging become the next goal for NEVI funding in California? If so, how should future solicitations factor in federal requirements on connector and charger sizes?*

Voltera encourages the CEC and Caltrans to leverage NEVI funding for infrastructure that supports both the M/HD sector, as well as LD fleets. Voltera encourages the CEC and Caltrans to evaluate how to leverage NEVI to support commercial vehicles. Voltera also encourages the agencies to evaluate how to invest in "shared" infrastructure utilized by multiple fleets but not more broadly open to the public. Open to the public is a well-meant requirement, but can have the unintended consequence of inhibiting private investment where utilization risk cannot adequately be overcome by incentive support, or arguably worse, potentially enabling unsustainable private investment where the business case even augmented by incentive support cannot sustain itself.

There is an opportunity to structure NEVI to support commercial fleets. Specifically, NEVI program guidance states that, "NEVI Formula Program funds are restricted to projects that are directly related to EV charging infrastructure that is open to the public[6] *or* to authorized commercial motor vehicle (see 23 CFR 658.5) operators from more than one company." Further, a commercial motor vehicle is defined as a motor vehicle designed or regularly used to carry freight, merchandise, or more than ten passengers, whether loaded or empty, including buses, but not including vehicles used for vanpools, or recreational vehicles operating under their own power.[7] Voltera interprets these definitions as providing the agencies with a clear framework to consider making commercial fleet investments with NEVI funds, and would encourage the CEC and Caltrans to consider doing so.

Voltera specifically recommends that the agencies consider structuring the forward NEVI program to support "shared" fleet projects, through "shared infrastructure." This approach will be especially useful for the M/HD sectors, which are fundamentally different than light duty fleets, and need significant support to meet the charging needs of trucks and other commercial vehicles. Truck fleets have relied heavily on both public and private refueling historically. A relevant consideration may be to align future NEVI funding with the "shared MHD-FCI charging site" provisions under development at the California Air Resources Board through the Low Carbon Fuel Standard Regulation. Under this definition, the EV fast charging site must be made

[6] Publicly accessible means the equipment is available to the public without restriction. A station that is not maintained or restricts access only to customers, tenants, employees, or other consumers is not publicly accessible. Please note that while hydrogen, propane, and natural gas fueling infrastructure are not eligible under the NEVI Formula Program, these additional fuels are eligible under the Corridor Charging Grants and the Community Charging Grants (23 U.S.C. § 151).

[7] For definition of *commercial motor vehicles,* see: https://www.fhwa.dot.gov/environment/nevi/formula_prog_guid/90d_nevi_formula_program_guidance.pdf

available to at least two MHD EV fleets under different ownership, or to the public for at least 12 hours each day.[8]

Based on this historic reliance and the economic challenges with ZEV infrastructure investment and development, Voltera believes that the CEC and Caltrans can significantly improve commercial vehicle access and business ZEV adoption by ensuring funding access for projects seeking to serve those vehicles and businesses. As such, Voltera recommends adjusting the program to promote both commercial fleet and (if required) shared fleet participation.

3. *General comments by Voltera regarding continuing infrastructure funding needs*

While Voltera is supportive of adjusting the NEVI program to make it accessible to the M/HD sectors, NEVI funding alone will not be sufficient to meet the rapidly expanding needs of this segment. As identified in the CEC's AB 2127 analysis, California will need approximately 2,900 MW of charging capacity by 2025 and 11,600 MW of capacity by 2030.[9] Relatedly, the California Trucking Association estimates that 300-600 DC fast chargers need to be installed every week to meet the state's 2035 needs.[10] These demands imply the need for continued and accelerated funding availability to meet California's long-term objectives, and while the potential of $200 million available through the NEVI will be critically important, it will not be sufficient to achieve the state's wider infrastructure goals.

Conclusion

Voltera appreciates the opportunity to provide our feedback. Voltera encourages the CEC and Caltrans to prioritize NEVI infrastructure investments in support of fleets, including commercial vehicles, and to specifically expand project eligibility beyond "public" to include "shared." This

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[8] See LCFS Regulation: "Shared MHD-FCI charging site" means an EV fast charging site that is available to at least two MHD EV fleets under different ownership, or to the public for at least 12 hours each day. The site must not have obstructions or obstacles precluding the fleet vehicles from entering site premises, and no registered equipment training shall be required for individuals to use the site" Website Access: https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2024/lcfs2024/lcfs_appa1.pdf

[9] The California Energy Commission's AB 2127 report uses the HEVI-load model to forecast the number of depot and public chargers required for MHD charging under the AATE3 primary scenario. This forecast predicts the number of chargers and their respective power ratings that will be required in 2025 and 2030, as seen in Appendix-H, Table H-1. The sum of the total MHD charging capacity based on this forecast was calculated to be 2,900 MW and 11,600 MW by 2025 and 2030, respectively, by taking the sum-product of the number of chargers and their respective power rating.

[10] Chris Shimoda Senior Vice President of Government Affairs California Trucking Association; R.24-01-018 — Public Workshop Discussing the Development of Energization Timing Targets and Processes to Report Energization Delays California Public Utilities Commission; February 2, 2024; Website Access: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/infrastructure/energization/ab50_sb410-energization-workshop_02022024.pdf

will more closely align with the needs of fleets, and enable CEC and Caltrans to solicit projects from a wider set of infrastructure companies. Importantly, while Voltera is supportive of investing NEVI program funding into M/HD infrastructure, significant continuing funding beyond NEVI is needed to meet California's burgeoning M/HD infrastructure sectors.

Please reach out to me with any questions or for clarification regarding this correspondence.

Thank you.

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