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Response of Voltera to US DOT CFI Grant Program

Voltera appreciates the opportunity to provide these comments in support of the application underway by the California Energy Commission (CEC), California Department of Transportation (Caltrans), the Oregon Department of Transportation (ODOT), and the Washington State Department of Transportation (WSDOT) (herein after the â€œTri-State Partnershipâ€□ or â€œPartnershipâ€□).

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

Thank you,

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Additional submitted attachment is included below.

voltera

June 10th, 2024

Sarah Sweet, Federal Liaison
California Energy Commission
Docket Unit, MS 4
Re: Docket No. 24-EVI-01
715 P Street
Sacramento, CA 95814-5512

Re: Response of Voltera Power LLC ("Voltera") to Docket # 24-EVI-01 Project Title: U.S. Department of Transportation's Charging and Fueling Infrastructure Grant Program

Filed electronically in Docket # 24-EVI-01

Sarah Sweet,

Voltera appreciates the opportunity to provide these comments in support of the application underway by the California Energy Commission (CEC), California Department of Transportation (Caltrans), the Oregon Department of Transportation (ODOT), and the Washington State Department of Transportation (WSDOT) (herein after the "Tri-State Partnership" or "Partnership"). We are pleased to learn that the Tri-State Partnership is seeking to secure funding to support medium- and heavy-duty corridor projects through the U.S. Department of Transportation — Federal Highway Administration's Charging and Fueling Infrastructure Discretionary Grant Program (CFI Program).

Through this correspondence, Voltera provides feedback regarding our interest in supporting the Tri-State Partnership. Please see our response to direct questions posed by the Tri-State Partnership:

1. Please disclose your business type and vehicle class, if applicable. Are you a driver, fleet operator, truck stop operator, installer, manufacturer, utility, public agency, or other? Are you part of a small, veteran-owned, woman-owned, or minority-owned business?

Voltera is a for-profit corporation. 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 sites. Voltera solves these challenges by siting, investing in, 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 address the EV infrastructure challenge and enable scaled zero-emission transportation. Voltera's customers span from rideshare to drayage fleets to branded charging networks, 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.

Voltera is optimist that the funding secured by the Tri-State Partnership through the CFI solicitation will help fortify these initiatives. Voltera's current initiatives in California include:

- Goods movement: Voltera recently announced the opening of its first Class 8 drayage charging depot in the Los Angeles region, near the Ports of Los Angeles and Long Beach. The project is Voltera's first scaled truck site with 65 installed high-powered DC fast chargers (DCFC).[1] 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 and the South Coast Air Quality Management District.[2]

- People movement: Voltera has purchased and is developing multiple properties in California to support light-duty (LD) rideshare electrification, including in the San Francisco and Los Angeles regions.

- Wider Acquisition: Voltera is expanding nationally. 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.[3] These acquisitions are part of a broader national strategy, and consist of two primary market segments (i.e., customer-specific sites, and "thesis" sites). For our customer sites, Voltera enters a partnership directly with a fleet customer to provide our turn-key solution and acquires a property specifically to meet the needs of that designated customer. Voltera also purchases "thesis" sites, which are strategically acquired in preparation for future customer needs and demand.

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[1] "Einride opens largest charging station for heavy-duty EVs, powered by Voltera;" Website Access: https://electrek.co/2024/03/21/einride-opens-largest-charging-station-for-heavy-duty-evs-powered-by-voltera/

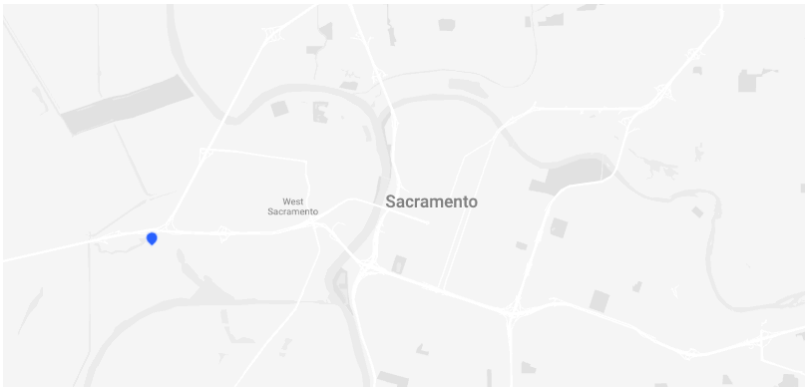
[2] Website Access: https://www.volterapower.com/post/voltera-secures-9-6m-federal-grant-to-electrify-major-us-ports-savannah-los-angeles-and-long-beach

[3] Reference: Voltera Solutions, EV Charging and Infrastructure Services. Website Access: https://www.volterapower.com/solutions

- Regulatory: Voltera is actively engaged in multiple regulatory proceedings. We are a party to Rulemaking 23-12-008, Order Instituting Rulemaking Regarding Transportation Electrification (TE) Policy and Infrastructure, before the California Public Utility Commission (CPUC), which is intended to address future utility TE programs. Voltera is also engaged as a party in Rulemaking 24-01-018, the Order Instituting Rulemaking to Establish Energization Timelines, where we provide feedback with respect to site energization experiences. With respect to credit markets, Voltera is a registered California Low Carbon Fuel Standard (LCFS) program credit generator and has actively engaged in the recent California LCFS and Washington State Clean Fuel rulemakings.

2. Would you consider applying for CFI grant funding for site development if the Tri-State Partnership are awarded funding?

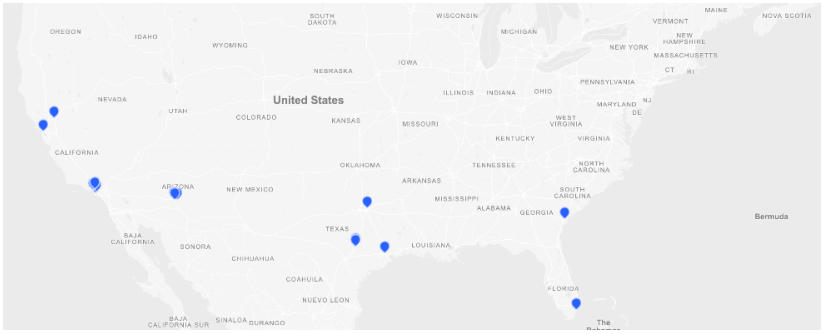
Yes. Whether relevant to an existing property such as a site Voltera owns in proximity to the California corridor Segment 1 (I-5 Red Bluff to Zamora) or for future site(s), Voltera is keen to partner with the Tri-State Partnership. Notably, outside of supporting branded networks, Voltera's business has thus far been focused on fleet charging with dedicated access. Although Voltera is unlikely to take on utilization risk, we have been ideating on creative strategies to enable public sector entities to benefit from Voltera's capital access, and for Voltera's customers is key segments to benefit from incentive access. Voltera would welcome endorsing the Partnership's application and engaging with the Partnership to maximize the application's competitiveness. The following image indicates the location of Voltera's cited site, located close to the junction of I-80 and I-5.



3. Do you already operate or are you planning to use zero-emission battery electric MDHD vehicles in the next five years? Please use a 1-5 rating scale where 1= least likely and 5= most likely. Please add additional information regarding your (planned) use of zero-emission battery electric MDHD vehicles as desired.

Voltera has built and is operating (and is currently building) EV charging infrastructure to support zero-emission battery electric MDHD vehicles. As discussed earlier, Voltera opened its first Class

8 drayage charging depot in the Los Angeles region, with an official launch in April. The project is Voltera's first scaled truck site with 65 installed high-powered DCFCs.[4] Voltera is actively in review of a national portfolio and envisions the opportunity to focus attention to support the Tri-State Partnership's application. The following map provides a proximate snapshot of the properties that Voltera has acquired to date.



4. What type of MDHD ZEV public charging do you anticipate being most important in the next three years (2024-2027) — en route or overnight charging? For what purposes do you anticipate needing public charging infrastructure — drayage, last-mile, delivery, long-haul freight, other?

To encourage market diversity for the M/HD ZEV sector — all of which is nascent — Voltera encourages the Tri-State Partnership (to the extent possible) to remain agnostic as to fleet purpose prioritization under the CFI program. That said, there is a clear need to support fleets that are mandated to electrify, and in this regard Voltera encourages the Tri-State Partnership to prioritize support to fleet stakeholders that are subject to such mandates in M/HD sectors. With such mandates in place, it is mission critical to rapidly accelerate infrastructure deployment in a manner that achieves state objectives for these sectors. For the M/HD sectors, Innovative Clean Transit (ICT),[5] Advanced Clean Trucks (ACT)[6] and Advanced Clean Fleets (ACF)[7] regulations have established clear mandates to achieve ZEV targets. Voltera believes that CFI can serve as an important resource to help enable stakeholders to achieve the goals and comply with the mandates of the ICT, ACT, and ACF regulations.

Public, private, and shared access

Voltera encourages the Tri-State Partnership to evaluate if there are pathways to innovatively invest in infrastructure that can be accessed by M/HD fleets, through provisions that support

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[4] "Einride opens largest charging station for heavy-duty EVs, powered by Voltera;" Website Access: https://electrek.co/2024/03/21/einride-opens-largest-charging-station-for-heavy-duty-evs-powered-by-voltera/

[5] Website Access: https://ww2.arb.ca.gov/our-work/programs/innovative-clean-transit/about

[6] Website Access: https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-trucks-fact-sheet

[7] Website Access: https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-fleets-regulation-summary

private or shared access. Here, Voltera encourages the Tri-State Partnership to maintain flexible access requirements where feasible within the FHWA program framework.

While Voltera provides a ClaaS model, we stress that many of our projects are designated for specific fleet customers who have specific operational needs and demands, and as such are not recognized as public charging. Here, Voltera encourages the Tri-State Partnership to evaluate various pathways 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.

Voltera further recommends that the Tri-State Partnership consider structuring its CFI response to support "shared" fleet projects, through "shared infrastructure" to the extent permitted. 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. Despite the historic reliance on public fueling and recognizing the economic challenges with ZEV infrastructure investment and development, Voltera believes that the Tri-State Partnership can significantly improve commercial vehicle access and business ZEV adoption by ensuring funding access for projects seeking to directly serve those vehicles and businesses.

5. From 2024-2027, what is your first priority for power level and number of charging ports for public en route charging at a station? For public overnight charging? Do you have a second or third configuration preference?

To embolden market diversification and to not overly restrict site investments, Voltera encourages the Tri-State Partnership to provide flexibility with regards to power levels and the required number of charging ports. This approach will help enable infrastructure providers to deliver a variety of solutions to meet market needs, and closely aligns with state policies to promote transportation electrification projects that minimize costs while maximize benefits. Specifically, Voltera encourages the Tri-State Partnership to enable infrastructure developers to provide a variety of solutions to meet market needs, which may or may not translate to specific power levels (min. or max.) and charging port numbers (again, min. or max.).

That said, as Voltera builds infrastructure consistent with a diverse array of customer needs, we continue to notice a key pattern in terms of the types and levels of services that are demanded by customers. Specifically, nearly all of Voltera's M/HD projects exceed 10MWs. Relatedly, based on our engagement with our customers thus far, Voltera believes that our customers will increasingly need projects to be energized at sizes in excess of 10MWs.

6. Please identify the percentage of pull-in or pull through parking preferred and other desired station configurations at a given site. Describe the vehicle class and vocation considered when making this recommendation if it differs from the information provided in question 1.

Voltera does explore the prospect of operating a portion (or ratio) of a site in exclusive support to a customer (or customers), with designated areas for public charging. Voltera does not have a specific percentage preference for pull-in or pull through parking. We also do not have a set percentages of vehicle classes targeted for our sites, as we build sites specific to customer needs, demand, and operational requirements.

7. What distance should separate charging stations to support zero-emission trucks along the I-5 corridor? Provide description of typical route or use-case considered when making this recommendation. Describe the vehicle class and vocation if it differs from the information provided in question 1.

Voltera is an infrastructure and real estate company, and observes that there is very little M/HD charging along the I-5 corridor, as evidenced in the National Zero-Emission Medium-and Heavy-Duty Infrastructure Map recently published by CALSTART.[8] As such, to encourage early-stage deployment that rapidly places first-stage infrastructure into use, Voltera would encourage the Tri-State Partnership to not unduly constrain site development by placing arbitrary distance limitations. Relatedly, the Tri-State Partnership may want to gather additional information with respect to the typical route or use-cases. Here, Voltera encourages the Tri-State Partnership to review the various "heat maps" that have been archived within the EPRI EVs2Scale mapping tools, which can provide a proxy for M/HD fleet travel patterns and help inform the Tri-State Partnership's application.[9]

In addition, Voltera provides feedback on how our business model is driven by locational preference and demand from our fleet customers. Specifically, our Lynwood site is located in proximity to the Ports of Los Angeles and Port of Long Beach, allowing for our customer to leverage the location to support trucks serving both ports. Indeed, locating infrastructure near the ports was a priority, and we encourage the Tri-State Partnership to evaluate methods of prioritizing support to the ports, widely.

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[8] National Zero-Emission Medium-and Heavy-Duty Infrastructure Map; Website Access: https://calstart.org/mhd-infrastructure-map/

[9] EPRI's EVs2Scale2030™ initiative is a three-year commitment focused on leveraging industry scale to galvanize not only the utility industry, but to align all critical market stakeholders as electric vehicle goals increasingly target 50 percent new vehicle sales by 2030; Website Access: https://msites.epri.com/evs2scale2030

8. What amenities are you seeking at a charging facility? Is there a desire for additional parking at a facility beyond charging stalls? Is there a desire for reservation options?

As much as feasible, Voltera builds sites specific to customer needs, which to date has included specific amenities to support fleet operations. For example, our Lynwood location includes a break room, bathroom, office space, and other amenities to support the property's operational needs. Voltera encourages the Tri-State Partnership to assemble a list of amenities that it seeks for projects as part of the application, including and not limited to the amenities noted.

9. If possible, provide any general cost estimates for MDHD charging stations you have designed, built, or have experience with, including charger power levels and number of chargers installed. Please provide a range of public cost share as a percentage of total project cost that would be necessary to support more public charging stations to serve zero-emission trucks along freight corridors.

There are many factors that impact the cost of our turn-key offering. As discussed prior, Voltera's ClaaS model consists of site identification and acquisition, site development, hardware deployment, operations, and maintenance. Since our model involves the purchase or rental of land, cost factors include and are not limited to the age of buildings on site, size and condition of the property, neighborhood appeal, zoning permissions and restrictions, and the health of the overall real estate market. With respect to site development, there are a diverse array of direct costs, including engineering, project controls, construction, and commissioning. There are also a number of time-oriented factors that impact cost, such as AHJ and utility coordination, utility/interconnection fees, permit coordination and costs, and development fees (for construction). Voltera also bears a series of indirect costs, including legal services, insurance, and the like. With respect to cost share, Voltera is realistic and would seek to enable the competitiveness of the Tri-State Partnership's application, balanced with Voltera's experience with customers' needs and navigation of private capital access.

10. Use the maps under the "Corridor Segments" section below to identify locations within the National Zero-Emission Freight Corridor Strategy hubs along I-5 (identified in the map segments 4 below) you anticipate needing EV charging in the next three years (2024-2027). You may identify sites where you plan to or would be interested in building charging stations or where you would like to see charging as a consumer. Please detail preferred locations across California, Oregon, and Washington. For each location, please provide desired site characteristics including number of chargers, power levels, type of charging desired (overnight or en route), and vehicle class and vocation if the information differs across locations or differs from the information provided in the questions above.

In response to question #2, Voltera noted the approximation of our West Sacramento to the Red Bluff to Zamora corridor. As a general note, Voltera would like to express our general interest in partnering with the Tri-State Partnership. Based on current analysis, investment relevant to

corridors represented in Figures 1, 2, 3 and 6 (Washington State Corridor Segment #1- Blaine to Southcenter; Washington State Corridor Segment #2- Du Pont to Vancouver; Oregon Corridor Segment #1 -Haden Island to Woodburn; and California Corridor Segment #2 - Interchanges of I-5 and Hwy 33, and I-5 and Hwy 46, respectively) are of interest to Voltera.

11. If you represent a utility, please use the maps under the "Corridor Segments" section below to identify locations within the National Zero Emission Freight Corridor Strategy hubs along I-5 (identified in the map segments below) where there may be capacity for 5 megawatts or more of power in the next five years. This information may be considered in the development for future Requests for Proposals.

Voltera is not a utility. However, to improve information sharing between stakeholders with respect to site capacity, Voltera would encourage the Tri-State Partnership to aggregate and publish information gathered specifically in response to this question.

Conclusion

Voltera is pleased for the opportunity to share our ClaaS model with the Tri-State Partnership. Voltera reiterates its interest in supporting the Tri-State Partnership's application. We have shared a high level of our statewide and nationwide growth strategy. To fortify its proposal, we encourage the Tri-State Partnership to:

- Develop an application response that prioritizes market diversity for the M/HD ZEV sector
- Evaluate potential pathways to innovatively invest in M/HD fleet infrastructure access, through provisions that support hybrid sites
- Provide flexibility with regards to power levels and the required number of charging ports
- Prepare to evaluate large sized projects in excess of 10MWs
- Not unduly constrain site development by placing arbitrary distance limitations
- Assemble a list of amenities that the Tri-State Partnership seeks to include in projects supported by the application, including and not limited to the facilities noted in Voltera's response, and
- Aggregate and publish information gathered via questions 11 related to utility energy capacity

Next Page

As strategic, and to best support the M/HD sector and create a highly competitive application, Voltera encourages the Tri-State Partnership to incorporate these recommendations. Please reach out to me with any questions or for clarification regarding this correspondence.

Thank you,

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