

**DOCKETED**

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**EV Realty Comments - Tri-State RFI**

*Additional submitted attachment is included below.*

June 21, 2024

California Energy Commission  
Docket No. 24-ALT-01

Submitted electronically to <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=24-ALT-01>

**Re: June 7, 2024 Public Meeting of the Advisory Committee for the Clean Transportation Program Investment Plan**

EV Realty appreciates the opportunity to provide comments on the recent Public Meeting of the Advisory Committee for the Clean Transportation Program Investment Plan (Advisory Committee Meeting). EV Realty thanks the California Energy Commission (CEC) for the work that has gone into developing the Draft Staff Report of the 2024-2025 Investment Plan Update for the Clean Transportation Program ("2024-2025 Investment Plan Update") and for hosting the Advisory Committee Meeting. This extensive public process, with multiple opportunities for review and input, should help maximize the impact of scarce public funds.

EV Realty develops, deploys, and owns multi-fleet EV charging hubs for commercial fleets. EV Realty's charging hubs enable truck electrification by providing critical charging solutions for fleets that may not be willing or able to deploy their own infrastructure due to grid constraints, landlord restrictions, resource limitations, or other operational considerations. This approach can also reduce overall costs by concentrating load in strategically chosen locations, thereby maximizing utilization of existing infrastructure and minimizing the need for grid upgrades. Ultimately, EV Realty's hubs will help meet the infrastructure needs outlined in the CEC's AB 2127 Charging Infrastructure Needs Assessment and will play a key role supporting implementation of the Advanced Clean Truck and Advanced Clean Fleet rules here in California by providing turnkey charging solutions for multiple fleets in high-traffic locations.

EV Realty generally supports the recommendations in the draft 2024-2025 Investment Plan Update. Specifically, we thank CEC for proposing to dedicate \$55.2 million in base funding to medium- and heavy-duty ZEV infrastructure. The electric truck market is still nascent. Well-designed incentives are essential to accelerate charging infrastructure deployment and put the state on a path to hit regulatory requirements for truck electrification, GHG reduction, and air quality improvement. While there is a clear need for additional funding, we recognize that this is a difficult year for the budget and greatly appreciate the fact that CEC is proposing to use base funds for truck electrification.

While CEC Clean Transportation Program funds are not the only support mechanism for charging infrastructure deployment, we do see this program as particularly important in the near future to fill gaps in the ecosystem. The California Public Utilities Commission (CPUC) has proposed to indefinitely pause a planned statewide charger rebate program, unexpectedly removing one key incentive for truck charging deployment. Federal funds such as the Charging and Fueling Infrastructure program (CFI) may provide an additional infusion of funds if CEC's application is successful. This program, however, has restrictive requirements around locations, public access, and site specifications that make it poorly suited to support "shared private" multi-fleet depots that have the sorts of security and access controls

truck fleets are often seeking for charging locations in and around key freight hubs. The proposed Fast Charging Infrastructure (FCI) provision within the Low Carbon Fuel Standard has the potential to attract more private capital to truck charging, but vitally important program rules remain in flux, credit values are depressed, and the board meeting has been postponed for several months. Ultimately all of these programs will be essential to California's efforts to electrify trucking, and we are encouraged that CEC has the flexibility to target Clean Transportation Program funds to meet needs that are not adequately supported by other programs.

EV Realty offers the following high-level observations and recommendations as CEC considers implementation and specific projects to support the market. Multi-fleet depots continue to represent one of the most promising potential investments to enable electrification at scale across a region. We see relatively streamlined programs like Energiize as necessary but not sufficient as the per-project caps are not well-suited to supporting construction of the large-scale depots currently under development by EV Realty and other companies offering charging as a service. Targeted funding for shared private depot charging would fill a gap in the market at a time when large-scale, high-visibility charging is needed to bolster fleet confidence in charging options.

To maximize the impact of state investments, we recommend aligning with the recently released National Zero Emission Freight Corridor Strategy by focusing in the near-term on building out the charging ecosystem in key freight hubs. Other funds – including CFI – are already targeting corridor charging needs for the later phases of the strategy. Furthermore, we recommend that CEC consider prioritizing “grid-ready” projects that have access to power without major upgrades or additional investments. This should both reduce overall costs and allow faster energization timelines, meaning CEC's investments can go further, faster.

We look forward to continued engagement with CEC and the broader stakeholder community as this plan is finalized and moves into the implementation phase. CEC continues to play a vitally important role in shaping California energy policy and directly investing in solutions to help achieve our shared goals. Thank you again for the opportunity to comment.

Sincerely,

Jamie Hall  
Director, Policy