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Comments of Voltera Power LLC on Clean Transportation Program Investment Plan

Voltera Power LLC (â€œVolteraâ€) is pleased to provide comments related to the Public Meeting of the Advisory Committee for the Clean Transportation Program Investment Plan.

Voltera looks forward to continuing to engage with the Energy Commission and expects to provide feedback on the revised Staff draft in September. Voltera also will welcome the opportunity for continued engagement with the Energy Commission and Advisory Committee during the Second Advisory Committee Meeting.

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 21, 2024

Commissioner Patty Monahan
California Energy Commission
Docket Unit, MS-4
715 P Street Sacramento, California 95814

Filed electronically in Docket No. 24-ALT-01

Re: Comments of Voltera Power LLC to the Public Meeting of the Advisory Committee for the Clean Transportation Program Investment Plan

Dear Commissioner Monahan,

Voltera Power LLC ("Voltera") is pleased to provide comments related to the Public Meeting of the Advisory Committee for the Clean Transportation Program Investment Plan. Voltera appreciates the Energy Commission's continued investments in transportation electrification (TE), the leadership of the Advisory Committee for its guidance informing the Clean Transportation Program Investment Plan draft, and the Commission's Staff for providing a robust update to the annual plan.

Voltera provides a series of recommendations that are intended to update the plan to meet the continuously evolving needs in the TE sector, and temper our feedback recognizing the complexities related to California's budget deficit which may impact the Energy Commission's investments.

I. 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 (CIaaS) model. CIaaS 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, 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.

Light Duty (LD)

Voltera has purchased and is developing multiple properties in California to support light-duty (LD) rideshare electrification, including in the San Francisco Bay and Los Angeles regions. These sites are intended to support stakeholders in meeting their regulatory responsibilities, notably including the Clean Mile Standard, and business priorities around electrification.[1]

Medium and Heavy Duty (M/HD)

Voltera is rapidly expanding in the M/HD sector. Voltera opened its first Class 8 drayage charging depot in the Los Angeles. The project is Voltera's first scaled truck site with 65 installed high-powered DC fast chargers (DCFC).[2] 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.[3] In addition, Voltera recently announced planned development of a truck site in Wilmington, California with support from the Federal Highway Administration and the South Coast Air Quality Management District.[4] Relatedly, Voltera secured $9.6 million from the Federal Highway Administration (FHWA) through

[1] CARB Clean Mile Standard, Website Access: https://ww2.arb.ca.gov/our-work/programs/clean-miles-standard#:~:text=The%20Clean%20Miles%20Standard%20Program,services%20operated%20by%20transportation%20networks

[2] "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/

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

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

the U.S. Department of Transportation's Reduction of Truck Emissions at Port Facilities program, for projects in Savannah, Georgia and the Wilmington site.[5]

Regulatory

In addition to engaging with the Energy Commission, Voltera is actively engaged in multiple regulatory proceedings, including before the California Public Utilities Commission (CPUC), and California Air Resources Board (CARB). We are a party to the CPUC's Rulemaking 23-12-008, Order Instituting Rulemaking Regarding Transportation Electrification (TE) Policy and Infrastructure, 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. Voltera has also motioned for party status and filed comments within the HIGH Distributed Energy Resources (DER) Proceeding (Rulemaking 21-06-017). Moreover, Voltera is also actively engaging with CARB's Low Carbon Fuel Standard regulation. Voltera intends on continuing to engage across the sister agencies to support continued policy development on ZEV issues, including funding strategies and recommendations.

II. Comments

The Energy Commission has significant responsibilities associated with enabling TE deployment. Voltera actively explores the Energy Commission's programs and incentives relevant to our business model to support our deployments in California. Voltera appreciates the Energy Commission's widespread initiatives and provides the following response to questions posed by the Commission and based on concepts covered through the June 7th workshop. Our comments are intended to encourage the Commission to adjust the Clean Transportation Program Investment Plan draft to better align with this upcoming investment with on-the-ground realities and experiences faced by the TE sector. The following section responds to the direct questions posed by the Commission.

Given the evolving state budget and federal funding context, does the proposed allocation of Clean Transportation Program base funds strike the right balance?

Voltera agrees with the proposed split between LD investments ($37 million) and M/HD investments ($55.2 million), with the significant caveat that these resources alone will not

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

be sufficient to support the widespread needs of either sector, even paired with significant private investment. Voltera continues to stress the need for massive and widespread investments in TE infrastructure, with the recognition that no single resource pathway may be adequate to meet the expanding needs of the TE sector.

Moreover, Voltera encourages the Commission to deploy program funding in a manner that prioritizes sectors that are mandated to electrify. Specifically, many of Voltera's current and future customers are mandated to both sell and adopt ZEVs at an accelerated rate to comply with regulations. These include the Clean Miles Standard (for the LD ZEV sector), as well as the Advanced Clean Trucks (ACT) and the Advanced Clean Fleets (ACF) regulations (which compel the M/HD sectors to rapidly electrify). With respect to M/HD infrastructure, the Commission is well aware of this widespread need, which is captured in the Commission's AB 2127 report. This report estimates that the M/HD sector will need approximately 2,900 MW by 2025 and 11,600 MW by 2030.[6] Relatedly, the California Trucking Association estimates that upwards of 300-600 DC fast chargers need to be installed every week to meet the state's 2035 needs.[7] This is a massive increase from the current weekly build rate.

As such, while Voltera agrees with the Commission that the funding proposal "strikes the right balance," given California's current fiscal issues, Voltera feels compelled to note that there is a broader need to enable the full resources necessary to meet California's long term ZEV goals, and further encourages the Commission to prioritize the sectors that must meet ZEV compliance requirements.

What are your high-level recommendations for LD infrastructure?

It is clear that the Energy Commission is experiencing a "do more with less" environment due to the uncertainties around the state budget. Here, Voltera strongly encourages the

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[6] 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.

[7] 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 CPUC: 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

Commission advance programming that enable “shared” solutions. Specifically, the Energy Commission is well positioned to lead the charge to promote private sector investments in EV ridesharing, EV rentals, or EV carsharing by prioritizing investments in designated EV charging infrastructure that specifically support these fleets. This adjustment would be especially valuable to accelerate electrification of the vehicles leveraging the transportation network company (TNC) platforms, which must meet 100% eVMT by 2030 under the Clean Miles Standard. In addition, this adjustment would directly align with a diverse array of existing policies, as California has prioritized electric car rentals and sharing as detailed in the 2013 ZEV Action Plan[8] and EV sharing policies in the 2015 ZEV Action Plan.[9] Relatedly, the CPUC has taken up the Clean Miles Standard rulemaking,[10] which this adjustment by the Energy Commission would directly support. As such, providing a “high-level” recommendation as requested, Voltera encourages the Commission to structure support for the continued and accelerated electrification of the EV ridesharing, EV rental, and EV carsharing sectors by promoting growth of its attendant EV infrastructure. Relatedly, Voltera recommends modifying the existing Charging Access for Reliable On-Demand Transportation Services (CARTS) program to allow for “fleet only” configurations that allow for access specific to assigned rideshare, carshare, and/or taxi fleets, and encourages the Commission to expeditiously return to reopening this adjusted program.

What are your high-level recommendations for M/HD infrastructure?

Given the existing circumstances, as stated prior, Voltera supports the funding allocation of $55.2 million for Fiscal Year 2024-25 to M/HD Charging. Voltera acknowledges that the M/HD infrastructure base allocations have not yet been proposed for 2025—2028 investments.[11] Voltera also acknowledges the current state of factors impacting allocations, including and not limited to the budgetary concerns impacting sectors across the state.

Building from a “do more with less” policy logic, to attract further private sector investment, Voltera encourages the Energy Commission to further evaluate how to invest in “shared” M/HD infrastructure utilized by multiple fleets (but not more broadly open to

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[8] Website Access: https://opr.ca.gov/docs/Governors_Office_ZEV_Action_Plan_(02-13).pdf
[9] Website Access: https://www.ca.gov/archive/gov39/wp-content/uploads/2018/01/DRAFT_2015_ZEV_Action_Plan_042415.pdf
[10] Website Access: https://www.cpuc.ca.gov/news-and-updates/all-news/cpuc-sets-path-for-transportation-companies-to-electrify-fleets-2024
[11] This is captured within Slide 45 of the presentation.

the public). Public accessibility is a well-meant policy, 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. This is especially the case in the nascent M/HD market. As such, Voltera specifically recommends that the Energy Commission prioritize developing projects to support fleet projects, through "shared infrastructure." Here, the Energy Commission is well positioned to firm up definitions around what constitutes "shared" infrastructure. For example, the Energy Commission may want to align with CARB's emerging LCFS definition, through which an EV fast charging site must be made available to at least two M/HD EV fleets under different ownership, ***or*** (emphasis added) to the public for at least 12 hours each day.[12] Broadly, providing further resources in support of "shared" infrastructure will help accelerate new and innovative business approaches better aligned with a diverse array of CIaaS stakeholders who are positioning to accelerate widespread M/HD infrastructure in support of California's zero emission requirements.

General Comments

Support for investments in zero-emission port infrastructure

Voltera supports the proposed funding allocation to support ZEV port infrastructure, which is slated as a 2026— 2027 investment of $130 million. However, to meet the pressing needs of multiple ports (many of which have developed robust clean air action plans - such as the Port of Long Beach,[13] as well as zero emissions cargo-handling plans such as the Port of Oakland),[14] Voltera recommends that the Energy Commission consider reallocating these funds as part of its 2025— 2026 investment strategy. As currently planned, these funds would not be made available until 2026— 2027, which would hamper the ports' ability to achieve their environmental objectives — particularly

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[12] 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
[13] Clean Air Action Plan, Website Access: https://polb.com/environment/our-zero-emissions-future/#program-details
[14] Port of Oakland calls for zero emissions, cargo-handling plans; Website Access: https://www.portofoakland.com/press-releases/port-of-oakland-calls-for-zero-emissions-cargo-handling-plans/

given the average project development and deployment timeline. In addition, Voltera would encourage prioritizing a 2025— 2026 allocation as a means to help accelerate a series of existing port plans focused on ZEVs, which include building additional supporting infrastructure for M/HD fleets. Voltera would encourage the exploration of this reallocation in a scenario where the upcoming Cap & Trade auction return is stronger than initially expected (which would create a stronger Greenhouse Gas Reduction Fund allocation).

Block Grants & Incentives

Voltera aligns with comments provided during the June 7 Advisory Committee Meeting in support of block grant programs and encourages the Energy Commission to maintain investments in these critical programs. The block programs have provided critical funds that have included and have not been limited to the Energiize program. To support strengthened market confidence, Voltera recommends that these programs be maintained. Moreover, to continue to promote widespread vehicle adoption, Voltera would encourage the Commission to continue to leverage funding in the block grant programs to promote both light-duty, as well as M/HD vehicle incentives to help pay down the upfront costs of ZEVs.

Federal Resources

Voltera applauds the Energy Commission's continued leadership in support of leveraging federally allocated funds, as well as applying for competitive funds. Voltera welcomes the opportunity to provide support to the Energy Commission as it pursues competitive funding, and most recently filed information to support the Tri-State application for CFI.[15] While Voltera endorses the Energy Commission's pursuit of these resources, they should not be relied upon nor considered a sufficient replacement for state-based funding which should be allocated and secured to achieve California's broader statewide and long-term ZEV goals.

III. Conclusion

Voltera appreciates the opportunity to provide our feedback. There are opportunities for the Commission to undertake a series of incremental adjustments to existing programs to

[15] See:" Response of Voltera to US DOT CFI Grant Program." Website Access: https://efiling.energy.ca.gov/GetDocument.aspx?tn=256787

more efficiently leverage state dollars, which is especially critical given the current budgetary climate.

In this regard, Voltera encourages the Energy Commission to prioritize infrastructure investments in support of both LD and M/HD fleets that focus on “shared” infrastructure, as discussed. We further encourage the Commission to maintain investments in block grants and fleet incentives accelerators, and commend the Commission on its leadership to capture federal funding (although we emphasize that California not overly rely upon securing these).

Voltera looks forward to continuing to engage with the Energy Commission and expects to provide feedback on the revised Staff draft in September. Voltera also will welcome the opportunity for continued engagement with the Energy Commission and Advisory Committee during the Second Advisory Committee Meeting.

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

Thank you.

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