

**DOCKETED**

<b>Docket Number:</b>	19-TRAN-02
<b>Project Title:</b>	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
<b>TN #:</b>	258185
<b>Document Title:</b>	InductEV Comments - InductEV Comments on the MDHD Zero-Emission Vehicle Infrastructure Solicitation Concepts
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	InductEV
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	7/30/2024 1:04:31 PM
<b>Docketed Date:</b>	7/30/2024

*Comment Received From: InductEV  
Submitted On: 7/30/2024  
Docket Number: 19-TRAN-02*

**InductEV Comments on the MDHD Zero-Emission Vehicle  
Infrastructure Solicitation Concepts**

*Additional submitted attachment is included below.*



California Energy Commission  
715 P Street  
Sacramento, CA 95814

July 30, 2024

## **InductEV Comments on the MDHD Zero-Emission Vehicle Infrastructure Solicitation Concepts**

Dear California Energy Commission Staff,

InductEV, a wireless inductive charging infrastructure provider, would like to thank the California Energy Commission for the opportunity to provide comments on the Pre-Solicitation Concepts for Medium-and Heavy-Duty Zero-Emission Vehicle Infrastructure as outlined during the July 16, 2024 webinar. CEC has consistently provided stakeholder outreach and engagement opportunities to gather feedback to inform and refine program design to ensure programs are meeting their intended goals – a process we greatly appreciate.

**InductEV's comments on CECs proposed solicitation Concepts for Medium-and Heavy-Duty Zero-Emission Vehicle Infrastructure outlined during the July 16<sup>th</sup> webinar are provided below.**

### Support Program Eligibility for Wireless Charging as Part of a Technology-Neutral Approach to Incentives

InductEV recommends that commercially available wireless inductive charging technology be included amongst the eligible equipment for all solicitation concepts. As currently proposed, CEC's deference to the *EnergIIZE Commercial Vehicles Eligible EV Technology* catalogue prohibits fleet and vehicle owners and operators from choosing a wireless charging solution through funding programs such as CRITICAL PATHS 2.0. CEC should assume a technology agnostic posture to maintain market-neutrality and ensure consumer choice for fleet operators when considering which technologies make the most sense for the successful electrification of their operations. As fleet operators continue to signal range and impact to duty cycles as primary concerns when considering their electrification plans, the proven successes and benefits of wireless inductive charging solutions are increasingly being sought. We encourage CEC to directly include wireless charging amongst the Equipment Eligibility Requirements. Eligibility for wireless charging is particularly of relevance for non-public infrastructure deployments such as those at or near port terminals, those serving critical first- and last-mile duty cycles, and within transit systems, where fleet operators have direct control over both vehicle and fueling infrastructure configurations. Funding programs should allow all proven, commercially available technologies and relevant parties to participate in order to facilitate innovation, encourage competition and ensure choice, and accelerate zero-emission vehicle adoption.

### **About InductEV**

InductEV is a technology company that designs, develops, and manufactures wireless charging systems primarily for heavy-duty electric vehicles (EVs), focusing on port and intermodal fleets, as well as commercial transit bus fleets. Our mission is to facilitate the success of business, communities, and the planet by driving the widespread adoption of wireless energy. With a firm commitment to sustainability and innovation,

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InductEV is dedicated to creating a thriving future where wireless power revolutionizes industries and positively impacts lives.

InductEV wireless charging systems use resonant inductive charging technology that is commercially being deployed in several transit systems in the United States and in mobility fleets in Europe.

Wireless charging reduces and solves many of the key challenges faced by fleet operators transitioning to electric vehicles. Wireless chargers are fully automated and contactless, delivering a charge within seconds of the vehicle arriving at regularly scheduled stops, therefore reducing downtime and increasing operational efficiency while eliminating concerns that come with the manual handling of high-powered cables. Embedded into the ground and with no moving parts, InductEV wireless chargers are more durable, reliable, and easier to maintain than conductive wired charging alternatives. InductEV also employs a modular charging pad design, which facilitates easy maintenance and system service in addition to scalability and flexibility. The modular design enables interoperability across vehicle types and allows the system to be easily scaled up or down to meet a fleet's specific needs.

InductEV would like to thank CEC again for its commitment to stakeholder engagement and for the opportunity to provide comments on the forthcoming competitive solicitation for charging infrastructure. We applaud CEC's continued support for the transition to zero-emission transportation, and funding programs such as the concepts presented are essential to a successful, swift, and just transition for California. We are eager to work with you and your team to accelerate the deployment of high-powered, wireless charging infrastructure for medium- and heavy-duty vehicles throughout the region. If you have questions regarding any of the comments made above, please feel free to contact Michael Martinez, member of my staff, at [michael.martinez@inductev.com](mailto:michael.martinez@inductev.com).

Sincerely,

Dave Dealy  
InductEV President and Chief Commercial Officer

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