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CEC MHD Infrastructure Concepts Docket No 19-TRAN-02 Zeem Solutions

Additional submitted attachment is included below.

July 30, 2024

California Energy Commission
715 P Street
Sacramento, California 95814

MDHD Infrastructure Concepts Docket No 19-TRAN-02

Zeem Solutions (Zeem) appreciates the opportunity to provide comments on MHD Infrastructure Concepts following the California Energy Commission (CEC) workshop.

Zeem is at the forefront of building and operating zero-emission vehicle depots providing charging infrastructure, parking solutions, fleet management services, and electric vehicle leasing. These strategically located depots are spread across the country, near crucial hubs such as ports, airports, warehousing & distribution centers, and within customer facilities. Zeem's mission is centered on delivering a comprehensive solution that accelerates the transition to sustainable transportation for all fleets. Each depot includes high-speed charging stations designed to support a broad spectrum of electric vehicles, ranging from Class 1 to Class 8. With a focus on affordability, scalability, and environmental impact, Zeem is leading the way in accelerating the transition to electric mobility for fleets nationwide.

Shared Charging for Commercial Fleets

The requirement under *Concept 1: Charging and Refueling Infrastructure for Transport in CALifornia Provided Along Targeted Highway Segments (CRITICAL PATHS) 2.0* that charging be "open to the public 24 hours/day, 7 days/week year-round" is prohibitive to building out infrastructure for commercial fleets. While this definition of public access is pulled from Concept 1, comments in this section pertain to all CEC programs for MDHD charging infrastructure.

CEC's own EnergIIZE program now recognizes shared charging as eligible and defines it as infrastructure "intended for shared use by two or more MD/HD fleets". There are several reasons why shared charging depots are beneficial for commercial fleets both in return-to-base at depots and in corridor charging sites.

This aligns with the definition of eligible projects in Infrastructure Investment and Jobs Act (IIJA) under PUBLIC LAW 117–58—NOV. 15, 2021 135 STAT. 1423, "funds made available under this paragraph in this Act shall be for projects directly related to the charging of a vehicle and only for electric vehicle charging infrastructure that is open to the general public or to authorized commercial motor vehicle operators from more than one company".

This 24 hours/day, 7 days/week year-round requirement, which has been copied from the LD sector, does not align with commercial fleets' needs. Charging for MDHD vehicles is often higher-powered than LD infrastructure and is thus more expensive which increases the need for infrastructure to be secured behind a fence to prevent vandalism and theft. Additionally, commercial vehicle operators are more likely to plan their routes in advance which minimizes the need for 24/7 unrestricted access compared to passenger vehicles. Consequently, charging providers can plan charging sessions in advance, maximize charger utilization and efficiency, and prevent operational inefficiencies caused by unexpected visits. Fleets benefit from controlled access by being able to guarantee access to charging, through reservations for example, along their routes or where they domicile vehicles.

Concept 4: ZEV Port Infrastructure

We recommend that utility upgrades, even if they are covered in part by existing utility programs, be an eligible cost under this program. For example, SCE's Charge Ready Transport program covers some of the cost of utility upgrades but is capped up to an undisclosed amount for all projects. For our Long Beach site for example, we have been awarded a rebate but still have utility upgrade costs that are not covered by the program.

We recommend that charger count minimums and award minimums are eliminated to allow for more flexibility. If CEC wants to encourage deployments of large-scale depots, the scoring criteria can be leveraged to prioritize these sites instead of prescribing minimums. Small charging depots at ports are beneficial because they can bypass the need for costly utility upgrades and serve early adopters of ZEVs. These small sites can be future proofed to make adding additional chargers easy in future construction phases. This also minimizes issues where charging infrastructure becomes obsolete.

Sincerely,

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