

DOCKETED

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Forum Mobility Comments RE 19-TRAN-02, MHD Infrastructure Concepts

Additional submitted attachment is included below.



July 28, 2024

California Energy Commission
715 P Street
Sacramento, CA 95814

RE: 19-TRAN-02, MDHD Infrastructure Concepts

California Energy Commission staff,

Thank you for the opportunity to provide comments on the Pre-Solicitation Concepts for Medium and Heavy-Duty (MHD) Zero-Emission Vehicle Infrastructure. Forum Mobility (Forum) strongly supports the California Energy Commission's (CEC) continued investments in MHD zero-emission transportation infrastructure, which is critical to ensuring the State continues to improve air quality, reduce emissions, improve transportation systems, and reach our climate goals.

Forum Mobility, headquartered in San Francisco, California, provides turn-key zero-emission trucking solutions to help accelerate the deployment of zero-emission drayage trucks throughout California. Many smaller fleets and independent owner operators face barriers to adoption, including awareness of zero-emission vehicle options, the high up-front cost, navigating the incentive programs and installing the associated infrastructure. Forum helps overcome these barriers to adoption by developing, building, and operating the charging infrastructure, as well as purchasing and leasing class 8 zero-emission electric trucks – with the ability to secure available incentives to pass along to the truck driver or fleet owner. Forum provides a one-stop solution for a monthly fee for 'charging as a service' and/or 'truck as a service.' We currently have 8 depots in mid-to-late stages of development (totaling roughly 600 charging ports, supporting roughly 200 trucks) in and around the ports of Oakland, Long Beach, and Los Angeles, and along corridors to common freight destinations.

We strongly support continuing to maximize funding for MHD infrastructure. Per the CEC's analysis pursuant to AB 2127, California needs to install an average of over 60 MHD chargers per day, every day, for decades to meet the state's goals and Advanced Clean Fleet regulation. Unfortunately, we are currently nowhere near that speed nor scale of infrastructure construction.

For funding concepts 1, 2, and 4, we respectfully request the following modifications to help accelerate the deployment of zero-emission trucks and help California achieve its MHD zero-emission vehicle goals and regulations.

Concept 1, Critical Paths 2.0

1) Expanding eligible geography to at least 5-mile radius

We recommend expanding siting eligibility beyond the current one-mile limit from a corridor. Parcels of land with access to sufficient grid capacity (many depots will need between 2-15 MW) on distribution feeders is very limited and significant land is needed when factoring in zoning and egress/ingress requirements for large, MHD vehicles. During the consideration of the California Air Resource Board's Low Carbon Fuel Standard capacity crediting program, which proposed an alignment with NEVI's 1-mile limit, several utilities (with Southern California Edison being the most pointed) provided commentary to the effect that according to their analysis, sites with sufficient hosting capacity were extremely limited in the 1-mile corridor, and they accordingly recommended expanding to at least 5 miles¹.

We recognize that there has been a focus in the light duty passenger vehicle sector on locating charging within a mile of a major corridor. However, it is important to consider the differences in customer needs and site specifications. Light duty passenger vehicle charging on corridors requires quick access on and off freeways and a much lower amount of overall power at the site. A one-mile requirement, as required in the federal NEVI program as well as previous light-duty corridor charging programs funded by the CEC Clean Transportation Program, is therefore more suitable for light duty charging. For commercial trucks, the operational needs of fleets and the grid constraints inherent in multi-megawatt sites necessitates a wider range from a major corridor.

In addition, there is parity at other state agencies for this geographic eligibility, as CalTrans' *Call for Medium and Heavy Duty Zero Emission Vehicle Charging and Hydrogen Fueling Project* requires project locations to be within 5 miles of an SB 671 corridor.

2) Defining "publicly available" for MHD

We respectfully request defining "publicly available" for MHD vehicles to "The station must be open to at least two different trucking companies."

The usage and needs of MHD vehicles are very different than passenger vehicles, and policy must be adapted accordingly. Specifically, working trucks that deliver freight need to have a guaranteed spot to charge at the end of a duty cycle in order to be ready for the next, and need to be able to schedule mid-route charges rather than show up at a depot and wait. **Guaranteed access** and **schedulability of charging** are services that freight businesses need and 3rd party depots can provide. Public availability of depots must be defined to allow for the provision of these crucial services.

3) Maintain previous power level of 150kW

¹ <https://ww2.arb.ca.gov/form/public-comments/submissions/11986>

We recommend maintaining the previous minimum size of 150 kW per charging port. The MDHD sector is very different from the Light Duty sector, both in operational requirements and base access to charging. For LD, the basic premise is that most charging will occur at home, and public charging is needed either for fast recharges on road trips, or fast charging for those that are unable to charge at home. For MHD, however, many fleets will have to do all their charging at depots. Fleets that have long dwell times, such as overnight, can use slow chargers which are less costly and have a smaller impact on the grid. Additionally, intermittently slow charging helps maintain battery health. We believe that the market can solve for this issue. Note that there is no truck currently on the market that can accept more than 250 kW.

Concept 2, Implementation of MDHD ZEV Infrastructure Blueprints 2.0

1. Applicant Eligibility

We would like to clarify that an entity can apply for funding to support MHD ZEV charging, even if they have not received funding for a blueprint from the CEC or another entity.

Forum appreciates the opportunity to provide input on future CEC grant funding opportunities. This funding will help fleets accelerate the introduction and deployment of zero-emission technologies to meet California's long-term air quality, carbon neutrality, petroleum reduction, and climate change goals. We look forward to continuing to work with CEC and other stakeholders to accelerate the deployment of zero-emission freight transportation throughout the state.

Sincerely,

Adam Browning
EVP Policy and Communications
Forum Mobility