DOCKETED	
Docket Number:	19-TRAN-02
Project Title:	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
TN #:	258217
Document Title:	Voltera Comments on Staff Workshop on MHD ZEV Infrastructure Solicitation Concepts
Description:	N/A
Filer:	System
Organization:	Voltera
Submitter Role:	Public
Submission Date:	7/30/2024 4:56:02 PM
Docketed Date:	7/30/2024

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

Voltera Comments on Staff Workshop on MHD ZEV Infrastructure Solicitation Concepts

Voltera is pleased provide these, â€œComments on Staff Workshop on Medium- and Heavy-Duty ZEV Infrastructure Solicitation Concepts.â€□

We appreciate the opportunity to provide our feedback to these concept proposals. Please reach out to me with any questions or for clarification regarding this correspondence.

Thank you.

Paul D. Hernandez
Sr. Policy Manager, Government & Utility Relations
phernandez@volterapower.com
(510) 926-1923

Additional submitted attachment is included below.

voltera

July 30, 2024

California Energy Commission
California Department of Transportation
Re: Docket No. 19-TRAN-02

Re: Docket 19-TRAN-02: Voltera Comments on Staff Workshop on Medium- and Heavy-Duty ZEV Infrastructure Solicitation Concepts

Submitted electronically to docket@energy.ca.gov

Dear Energy Commission,

Voltera Power LLC ("Voltera") is pleased provide these comments in response to the Staff Workshop on Medium- and Heavy-Duty ZEV Infrastructure Solicitation Concepts. Voltera appreciates CEC's continued leadership as demonstrated in the Clean Transportation Program (CTP) and provides recommendations regarding programmatic adjustments to the Medium- and Heavy-Duty (M/HD) ZEV Infrastructure Solicitation Concepts that will support the next phase of the CTP and medium and heavy duty infrastructure deployment.

About Voltera

Voltera designs, builds, operates, and maintains infrastructure for fleets and branded charging networks — many of which are challenged in the current market to find viable off-premises charging solutions. Voltera solves these challenges by 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 (ClaaS) model. ClaaS 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 solve 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.

This year Voltera opened its first Class 8 drayage charging depot in the Los Angeles region. The project is Voltera's first scaled truck site with 65 installed high-powered DC fast chargers (DCFC). More recently Voltera announced plans for additional facilities near the Ports of Savannah, and Long Beach and Los Angeles, with support from the Federal Highway Administration. Further, 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.[1]

CEC's MHD Solicitation Concepts

Voltera advocates for EV charging infrastructure investments that help the state achieve its mandates, including those of Advanced Clean Cars II, Clean Mile Standard, as well as the Advanced Clean Trucks (ACT) and Advance Clean Fleets (ACF) regulations. Voltera sees CEC's MHD solicitation concepts as a critical component to help the state achieve the mandates of both the ACT and ACF regulations. While Voltera is supportive of these solicitations, Voltera stresses that CTP funding paired with private investment will alone not be sufficient to meet the rapidly expanding needs of this segment. As identified in the CEC's AB 2127 analysis, California will need approximately 2,900 MW of charging capacity by 2025 and 11,600 MW of capacity by 2030.[2] Relatedly, the California Trucking Association estimates that 300-600 DC fast chargers need to be installed every week to meet the state's 2035 needs.[3] These demands imply the need for continued and accelerated funding availability to meet California's long-term objectives, and while the CTP's annual investments will help bridge this gap, CTP funds alone will not be sufficient to achieve the state's wider infrastructure goals.

Voltera further acknowledges that developing an efficient CTP is especially pressing, given the state of the California budget, its potential impact on CARB's clean transportation programs, as

---

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

[2] 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.

[3] 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 California Public Utilities Commission; 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

well as the proposed program reductions that are under consideration before the California Public Utility Commission.[4] In this regard, Voltera provides feedback within a climate that we observe is undergoing a certain amount of programmatic "belt tightening." Here, Voltera will provide additional feedback on how to maximize the investments ultimately funded under the MHD solicitation concepts.

Comments

Voltera provides the following feedback based on the concepts and questions presented by the Commission:

Concept 1 Charging and Refueling Infrastructure for Transport in California Provided Along Targeted Highway Segments (CRITICAL PATHS) 2.0

Is the proposed increased minimum power output per charger from >150kW to >350kW reasonable?

Voltera stresses the nascency of the M/HD sector, and as such encourages the Energy Commission to maintain flexibility in determining the minimum power output per charger. Indeed, increasing power levels will increase potential vehicle throughput, however, individual fleets and users are likely to require different amounts of energy that are unique to their respective use cases. With respect to single customer fleets, Voltera envisions scenarios where customers will not always need—or want to pay for—350kW or higher per charger charging capacity, hence while mandating this level of charging for future infrastructure is well intended, doing so may unduly limit infrastructure providers' development and deployment of appropriate customer solutions.

What are the greatest barriers to developing public MDHD charging/refueling sites at this time? Electrification, permitting, land availability, others?

As do many within the ClaaS sector, Voltera experiences barriers related to utility energization timelines. In Voltera's direct experience, our customers in the M/HD sector are commonly requesting charging capacity in excess of 10MW per site. Further, based on our engagement thus far with our customers and potential customers, Voltera believes that our customers will increasingly need projects to be energized expeditiously within 12 months or less. This suggests that indeed, at scale, there will be substantial and accelerated capacity demanded by the M/HD sector fleet customers and the TE sector, widely. In this regard, Voltera encourages deep

[4] Administrative Law Judge's Ruling Initiating Track 1 and Inviting Party Comment; Order Instituting Rulemaking Regarding Transportation Electrification Policy and Infrastructure. Rulemaking 23-12-008; Website Access: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M532/K694/532694036.PDF

engagement with the utilities for the purpose of understanding true energization horizons, as well as any capacity constraints that may arise during the deployment of this EV charging infrastructure.

Did certain requirements in the first CRITICAL PATHS (GFO-23- 602) prevent potential applicants from submitting projects that would have achieved the goal of public MDHD ZEV infrastructure on priority corridors? Please elaborate.

Voltera actively evaluates CEC's solicitations, and evaluated CRITICAL PATHS (GFO-23- 602) last year. Voltera shares two key elements for consideration.

- **Public vs Private Access.** One of the primary challenges associated with pursuing funding under CRITICAL PATHS (as well as the concept solicitations as proposed) is the requirement for the infrastructure to be open to the public, and rigidly defining public access as 24 hours a day, 7 days a week, year-round. With respect to access, Voltera encourages the Energy Commission to develop and maintain flexible access requirements where feasible within program requirements. While Voltera provides a ClaaS model, thus far the majority of our projects are designated for specific customer segments who have specific operational needs/demands (e.g., rideshare fleets and drivers and customers, M/HD fleets and drivers, etc.), and as such these facilities have not historically enabled public charging. However, Voltera has begun to support branded charging networks that provide public charging, which we see strong fit for emerging programs such as those outlined within these solicitation concepts. Generally, Voltera encourages the Energy Commission to explore how to fund infrastructure that supports both public and shared fleet charging and encourages the Energy Commission to evaluate how to leverage funding to best support the needs of commercial vehicles and the fleet entities that operate them. "Open to the public" is a well-meant requirement 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 (and public) investment where the business case even augmented by incentive support cannot sustain itself. In this regard, citing activity within a similar EV infrastructure program, it is worth noting that, "NEVI Formula Program funds are restricted to projects that are directly related to EV charging infrastructure that is open to the public[5] *or* to authorized commercial motor vehicle (see 23 CFR 658.5) operators from more than

[5] Publicly accessible means the equipment is available to the public without restriction. A station that is not maintained or restricts access only to customers, tenants, employees, or other consumers is not publicly accessible. Please note that while hydrogen, propane, and natural gas fueling infrastructure are not eligible under the NEVI Formula Program, these additional fuels are eligible under the Corridor Charging Grants and the Community Charging Grants (23 U.S.C. § 151).

one company." Further, a commercial motor vehicle is defined as a motor vehicle designed or regularly used to carry freight, merchandise, or more than ten passengers, whether loaded or empty, including buses, but not including vehicles used for vanpools, or recreational vehicles operating under their own power.[6]

- **Shared Access.** Voltera further recommends that these solicitations be structured to support "shared" fleet projects, through "shared infrastructure" to the extent permitted. This approach will be especially useful for the M/HD sectors, which are fundamentally different than light duty fleets, and need significant support to meet the charging needs of trucks and other commercial vehicles. Truck fleets have relied heavily on both public and private refueling historically, meaningfully informed by operational footprints and use cases. Based on this historic reliance and the economic challenges with ZEV infrastructure investment and development, Voltera believes that the Energy Commission can significantly improve commercial vehicle access and business ZEV adoption by ensuring funding access for projects seeking to serve those vehicles and businesses. This alignment with a revised "shared" provision would be especially timely given current considerations within sister agencies and parallel California programs. Here, Voltera notes that the Low Carbon Fuel Standard regulation is evaluating how to define shared M/HD fleets as "two or more companies" for the purpose of awarding these entities with capacity credits.

Voltera interprets these definitions as providing the Energy Commission with a clear framework to consider enabling infrastructure for commercial fleets with these funds, and would encourage the Energy Commission to consider evaluating these provisions for their applicability to the proposed concepts.

Concept 4 ZEV Port Infrastructure

Voltera applauds the Energy Commission's investment in ZEV Port Infrastructure. Here, Voltera encourages the Energy Commission to approach this program with widened programmatic flexibility, and suggests that the Energy Commission remove the outlined port cargo tonnage ratios. This adjustment is recommended given the nascency of the M/HD ZEV market, as even projects that are focused on supporting "smaller tonnage" ports will be of value to help achieve California's wider ZEV objectives. In this regard, in lieu of focusing on tonnage, the Energy Commission may benefit from validating projects based on commitments from stakeholders (e.g. letters of commitment, etc.) which could be used to determine a project's preparedness. Moreover, Voltera would encourage the Energy Commission to not overly bind what defines a

[6] For definition of *commercial motor vehicles,* see: https://www.fhwa.dot.gov/environment/nevi/formula_prog_guid/90d_nevi_formula_program_guidance.pdf

service territory that supports the port, and encourage the CEC to define a radius to determine a proximity to ports (e.g., 20 linear miles, others). This approach will give flexibility to ClaaS companies to work within a scoped area to identify the appropriate infrastructure to support this project.

Conclusion

Voltera appreciates the opportunity to provide our feedback to these concept proposals. Please reach out to me with any questions or for clarification regarding this correspondence.

Thank you.

Paul D. Hernandez
Sr. Policy Manager, Government & Utility Relations
phernandez@volterapower.com
(510) 926-1923