

DOCKETED

Docket Number:	19-TRAN-02
Project Title:	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
TN #:	258257
Document Title:	InCharge Energy, Inc Comments - InCharge Energy Medium- and Heavy-Duty ZEV Infrastructure Solicitation Concepts
Description:	N/A
Filer:	System
Organization:	InCharge Energy, Inc.
Submitter Role:	Public
Submission Date:	7/31/2024 5:36:28 PM
Docketed Date:	8/1/2024

*Comment Received From: InCharge Energy, Inc.
Submitted On: 7/31/2024
Docket Number: 19-TRAN-02*

**InCharge Energy Medium- and Heavy-Duty ZEV Infrastructure
Solicitation Concepts**

Additional submitted attachment is included below.



July 31, 2024

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket 19-TRAN-02: Medium- and Heavy-Duty Zero Emission Vehicle Infrastructure Concepts

Dear California Energy Commission Staff,

InCharge Energy appreciates the opportunity to provide comment on Docket 19-TRAN-02: Medium- and Heavy-Duty Zero Emission Vehicle Infrastructure Concepts. We thank the Commission for its continued work to empower the transition to electrification.

InCharge was formed in 2018, with the leadership and support of industry veterans with over 100 years of combined electric vehicle and charging experience. Our seasoned team has expertise in utilities, public and private fleets, energy management, software, engineering, installation, O&M, and more. We provide scalable, end-to-end commercial EV and energy infrastructure and Charging-as-a-Service (CaaS) financing solutions.

InCharge is one of the few providers that is completely vertically integrated from site planning, EV charging hardware, fleet management software, installation, support, and service.

InCharge's primary focus is fleets, and our primary customer segments include automotive dealerships, commercial fleets (light duty, medium duty, and heavy duty), electric school buses, and autonomous vehicles. InCharge's customer base is approximately 30% public sector.

InCharge advocates for private fleet charging that helps the State reach its regulatory goals and mandates through the electrification of some of the nation's largest diesel polluting fleets. InCharge is helping companies comply with CARB's Advanced Clean Fuels regulations by providing turnkey EVSE installation that streamlines electrification while successfully overcoming many of the barriers to entry.

Below, we have provided general feedback on the four concepts presented by the commission in the docket and workshop:

North America HQ
1433 Fifth Street
Santa Monica, CA 90401

Engineering & Fulfillment
11625 Busy Street
N. Chesterfield, VA 23236

Field Services
9125 Rose Street
Los Angeles, CA 90706

Canada Office
800 Bd Hymus
Saint-Laurent, QC, H4S 0B5

833.772.4638

hello@inchargeus.com

inchargeus.com



Benefits of Mixed Use / Shared Access Models

As a fleet solutions provider, InCharge Energy understands the importance of providing efficient, accessible, and reliable charging solutions. With this, we believe that the current concept's definition of "publicly accessible" may hinder access to charging as it poses challenges with charger maintenance and variance in operations. We recommend that the commission reconsider and expand the definition of "publicly accessible" to include stations and sites that offer a mixed-use solution, with both public and private access slots, during normal hours of operation, instead of the 24 hours a day, 7 days a week, year-round concept to. When charging sites are not relegated to exclusively public access, they can be better utilized as MD/HD drivers can be ensured timely charging and access for optimal operations, while providers can maintain chargers more proactively.

This allows providers to develop and maintain sites that can be used by commercial fleets who may be deterred from electrification due to frustrations surrounding charger inaccessibility and varying charging needs and routes.

Additionally, exclusively publicly accessible sites have not been a large request from stakeholders as they do not align with a MD/HD model. Complete access poses security concerns to sites with expensive and high voltage equipment, while also being misaligned with trucking providers' needs. As many providers have planned routes and charging needs, there is not a high variability that can be seen in LD passenger charging.

Flexible Program Requirements

As industry stakeholders work through innovative charging solutions, efficiency, and grid readiness to provide a premium charging experience, it is essential to allow for program flexibility. Specified charger output requirements that limit variety of kW options place fleet operators charging needs in a one-size-fits-all category, while creating constraints on EVSE development. Programs should allow for sites to be "right sized" for vehicles, operations, and grid constraints.

North America HQ
1433 Fifth Street
Santa Monica, CA 90401

Engineering & Fulfillment
11625 Busy Street
N. Chesterfield, VA 23236

Field Services
9125 Rose Street
Los Angeles, CA 90706

Canada Office
800 Bd Hymus
Saint-Laurent, QC, H4S 0B5

833.772.4638

hello@inchargeus.com

inchargeus.com





Expedited Energization Timelines

Large fleets are profoundly impacted by operational disruptions, thereby requiring more expeditious timelines. InCharge has found value in developing strong partnerships with the utilities to help accelerate interconnection.

Expanding Charging Boundaries

InCharge recommends expanding the geographic boundaries for the Highway and Port Infrastructure would incentivize electrification for a more diverse applicant pool and increase utilization.

InCharge appreciates the opportunity to provide our feedback to the Commission's MD HD ZEV Infrastructure Solicitation Concepts.

Thank you,

Laura Rivas
Manager, Public Affairs
Laura.Rivas@inchargeus.com
(805) 452-1347

Ashley Levi,
Sr. Associate, Public Affairs
Ashley.Levi@inchargeus.com
(310) 906-7879

North America HQ
1433 Fifth Street
Santa Monica, CA 90401

Engineering & Fulfillment
11625 Busy Street
N. Chesterfield, VA 23236

Field Services
9125 Rose Street
Los Angeles, CA 90706

Canada Office
800 Bd Hymus
Saint-Laurent, QC, H4S 0B5

833.772.4638

hello@inchargeus.com

inchargeus.com

