

DOCKETED	
Docket Number:	19-TRAN-02
Project Title:	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
TN #:	258546
Document Title:	ZEEM SOLUTIONS Comments - Comments on Innovative Strategies for Accelerating MDHD Site Energization in POU Service Territories
Description:	N/A
Filer:	System
Organization:	ZEEM SOLUTIONS
Submitter Role:	Applicant
Submission Date:	8/16/2024 1:57:16 PM
Docketed Date:	8/16/2024

*Comment Received From: ZEEM SOLUTIONS
Submitted On: 8/16/2024
Docket Number: 19-TRAN-02*

Comments on Innovative Strategies for Accelerating MDHD Site Energization in POU Service Territories

Additional submitted attachment is included below.



August 15, 2024

California Energy Commission
715 P Street
Sacramento, California 95814

Comments on Innovative Strategies for Accelerating MDHD Site Energization in POU Service Territories

Zeem Solutions (Zeem) appreciates the opportunity to provide comments on strategies for MHD site energization in POU service territories 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 shared multi-fleet charging 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.

Challenges to Deployment of MHD Chargers in POU Service Territories

Publicly Owned Utilities play a critical role in delivering safe and reliable energy to their resident customers, and often do so with vastly smaller staff than their investor-owned utility counterparts. As such, administering comprehensive make-ready programs for the development of commercial electric vehicle charging depots may strain staff resources. Enhanced funding from the CEC whether managed by the POU or a third party could relieve that strain while still boosting adoption rates for electric fleets.

CEC should consider increasing available funds for make-ready costs in POU service territories to accelerate wide-spread adoption of zero-emission transportation, particularly in the MHD segment. For MHD Shared Charging sites, customer-side and utility-side make-ready costs dwarf the costs of the chargers themselves, which can render the economics of developing such a site as infeasible. This is particularly exacerbated at large shared charging depots which are 5-10MW. We applaud CEC programs such as EnergIIIZE which allow for make-ready costs in territories where utility make-ready incentive programs do not exist, but the current project funding cap of \$1 million is likely insufficient for larger

sites. Grants and incentive programs at the local, state, and federal level may be used to offset make-ready costs, but the competitive nature of these programs and the uncertain obtainment of these funds can stifle investment. Well-developed programs like Southern California Edison's Charge Ready Transport program give reasonable financial assurances to companies looking to make that investment. Additionally, high demand charges are a barrier to deploying MHD charging so a temporary or phased moratorium on demand charges would incentivize the build out of MHD charging infrastructure in POU territories.

Zeem Solutions considered building sites in two separate cities serviced by their respective POUs. Both projects were halted because the make-ready costs and demand charges would have been prohibitively expensive.

We recognize that POUs are under-resourced compared to their IOU counterparts in CA. It is important that charging infrastructure for MHD ZEVs is accessible across the state of CA, especially because CARB's Advanced Clean Fleets mandate affects fleets across the state. The CEC is uniquely positioned to support POUs in this transition to ZEVs by providing incentive support to projects in POU territories.

We appreciate this opportunity to provide our comments and appreciate the insights provided during the workshop. We look forward to continued collaboration with the CEC; please do not hesitate to reach out with any follow up questions.

Sincerely,

Dan Schweizer
Policy & Regulatory Affairs
dschweizer@zeemsolutions.com

Margaret Boelter
Policy & Regulatory Affairs
mboelter@zeemsolutions.com