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**Volvo Group Comments on Innovative Strategies for Accelerating
MHD EV Charging Site Energization in POU Service Territories**

Additional submitted attachment is included below.

2024-08-16

Patty Monahan
Commissioner
California Energy Commission (CEC)
715 P Street
Sacramento, CA 95814

Re: Docket No. 19-TRAN-02 - Innovative Strategies for Accelerating Medium- and Heavy-Duty Electric Vehicle Charging Site Energization in POU Service Territories

Dear Patty,

Volvo Group North America (“Volvo Group”) welcomes the opportunity to provide comments to the California Energy Commission (“CEC”) in regards to innovative strategies for accelerating medium- and heavy-duty (“M/HD”) electric vehicle (“EV”) charging site energization in public-owned utility (“POU”) service territories. We applaud the CEC for its vision and leadership in infrastructure planning for zero-emission (“ZE”) vehicles in California.

Volvo Group has spent years developing complete solutions for electromobility, and today – in North America – we are selling five configurations of the Volvo VNR Class 8 Electric¹ truck, the Mack LR Electric² waste hauler, the Mack MD Electric³ work truck, and five electric Volvo Construction Equipment models⁴. As one of the country’s leading providers of zero-emission infrastructure and transport solutions – Volvo Group offers its perspective as an active participant in the ZE transportation sector.

Workshop Comments

The challenge ahead in meeting California’s ZE goals is well-documented and was reinforced at this workshop. Some of the utility presentation portion of the program showed that the projected charging infrastructure deployments fail to meet the California Air Resources Board (“CARB”) market acceleration timelines by a long shot. At least one

¹ <https://www.volvotrucks.us/trucks/vnr-electric/>
² <https://www.macktrucks.com/trucks/lr-series/lr-electric/>
³ <https://www.macktrucks.com/trucks/md-electric/>
⁴ <https://www.volvoce.com/global/en/our-offer/emobility/>

utility used CARB Advanced Clean Fleets (“ACF”) regulation projections as its target, which was encouraging.

Two takeaways from the POU session of the workshop that we suggest need addressing by the CEC and other state agencies, potentially involving intervention by the Governor.

1. The state’s largest POU and the one at the crux of the short-term need for infrastructure – the Los Angeles Department of Water and Power (“LADWP”) – did not present at the workshop. Given that this agency is expected to provide more than a third of the POU M/HD infrastructure in the state, the industry would tremendously benefit from more transparency and accountability. The state will find it extremely challenging to meet its ZE goals without active engagement by the LADWP. So, it would be good to know how that agency plans to rise to this challenge in its back yard.
2. The smaller POUs which dot the state but often show up at critical junctures, as was demonstrated by the “Colton” presentation, need to be brought into the statewide planning process and supported by the state. These smaller, local agencies need to be made full partners in the state ZE plan rather than just bystanders that are likely to become collateral damage when the inevitable crunch to meet ACF timelines arrives.

The most positive part of the workshop was the presentations of working solutions to some of the issues. We heartily endorse the idea that CEC promote these and other like-minded innovations to ensure that the momentum towards ZE goals is maintained.

A positive signal from the state would be if the Governor’s Office or the CEC and the California Public Utility Commission (CPUC) could formally support these ideas. That would appear to be a necessary step given the LADWP’s initial denial of the Prologis proposal.

Microgrids will likely be not just an interim solution, but could stretch into longer use due to grid upgrade and energy generation challenges. The examples from Gridscape and Prologis showed the ability of current technology. Other issues raised by WattEV and other charging technology developers and providers merit additional scrutiny as it appears progress on TE infrastructure is often stopped at the local level by staff who either seem to not understand the state goals and plans, or simply disagree with them.

Conclusion

Thank you for the opportunity to comment. We look forward to continuing our productive work with the CEC, other state agencies and stakeholders to support the transition to the cleanest transportation in the Golden State while ensuring all communities benefit, especially those overburdened by air pollution and other negative effects of freight movement.

Kind regards,



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About the Volvo Group

Volvo Group drives prosperity through transport and infrastructure solutions, offering trucks, buses, construction equipment, power solutions for marine and industrial applications, financing and services that increase our customers' uptime and productivity. Founded in 1927, the Volvo Group is committed to shaping the future landscape of sustainable transport and infrastructure solutions. The Volvo Group is headquartered in Gothenburg, Sweden, employs almost 100,000 people and serves customers in more than 190 markets. North America is a major market for the Volvo Group, employs more than 17,000 people, and operates 10 manufacturing and remanufacturing facilities in seven U.S. states, as well as three plants in Canada and one in Mexico.

In California, the Volvo Group and its dealers employ more than 1,000 people with locations in Costa Mesa, Mountain View, Corona, Hayward, Fontana, Stockton, Fresno and La Mirada. Volvo Group is in the process of training and certifying dealers to sell and service its electric products. Currently three dealers in California have been certified with more expected to be added soon.