

**DOCKETED**

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<b>Project Title:</b>	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
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<b>Document Title:</b>	Port of Long Beach Comments on Pre-Solicitation Concept for Medium-and Heavy-Duty ZEV Infrastructure at CA Ports (Concept 4)
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**Comment on Pre-Solicitation Concept for Medium-and Heavy-Duty ZEV Infrastructure at California Ports (Concept 4)**

*Additional submitted attachment is included below.*



September 23, 2024

California Energy Commission  
715 P Street  
Sacramento, CA 95814

Subject: Port of Long Beach Comments Regarding the California Energy Commission Pre-Solicitation Concept for Medium-and Heavy-Duty Zero-Emission Vehicle Infrastructure at California Ports (Concept 4)

*Submitted Electronically:*     [Docket #19-TRAN-02](#)

Dear California Energy Commission (CEC) Staff,

The Port of Long Beach (Port) is pleased to submit this comment letter to the California Energy Commission regarding the pre-solicitation concept for Medium-and Heavy-Duty (MDHD) Zero-Emission Vehicle (ZEV) Infrastructure at California ports. Port staff attended the July 16, 2024 workshop where this concept was presented and strongly supports the CEC's plan to prioritize ZEV investments at seaports (Concept 4), especially during a fiscal year when funding is limited. The concept as presented includes a focus on building out grid capacity and onsite energy generation to power the ZEV infrastructure in the timeframe aligned with California's port zero-emission goals.

The Port of Long Beach has an ambitious goal to transition all cargo handling equipment to zero-emission by 2030. Given our significant experience with ZEV infrastructure projects for off-road equipment, we would like to share the following feedback for your consideration:

#### Port Utility Coordination

Southern California Edison (SCE) and the Port are closely coordinating on electrification at the terminals. Previously adopted agreements between the Port and SCE govern financing of future infrastructure investment at the terminals. SCE is committed to serving our terminals as they transition to zero-emission cargo handling equipment. As such, we believe that CEC funding for utility upgrades specifically for ZEV infrastructure may not be necessary. We request that the CEC will not weight projects that request funds for utility upgrades more heavily.

#### Focus on Infrastructure Master Planning

Our marine terminals are diligently working on infrastructure master planning to ensure that the electrical or hydrogen infrastructure is in place for charging ZE equipment. However, this planning has not placed significant emphasis on renewable energy generation due to the limited space at busy container terminals. The available land is primarily dedicated to maximizing cargo throughput, and rooftops often house security equipment. The Port recommends that applications demonstrating completed infrastructure master planning be prioritized in the scoring criteria. This would ensure that funding is allocated to well-prepared projects that can effectively

contribute to the goals of the solicitation. Additionally, we request that the CEC scoring criteria does not heavily weight on-site renewable energy generation as this could negatively impact the competitiveness of marine terminal applications from busier seaports like the Port of Long Beach.

#### Increase Maximum Award Amount

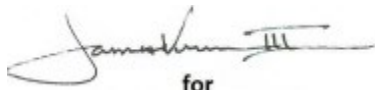
Given the high costs associated with infrastructure development at the Port, we recommend increasing the maximum award amount beyond the proposed cap of \$10 million per award to \$20 million per award for large ports. This increase would better align funding with the significant financial demands of these projects. For context, the Port requested a minimum of \$23 million per ZEV infrastructure project included in its application to the EPA Clean Ports Program. Our funding requests for ZEV infrastructure would have been greater for each project if the EPA had not capped the percentage of funding that could go towards infrastructure, and did not insert provisions around the eligibility of private industry partners.

#### Private Operator Eligibility

We strongly support the current approach to allow marine terminal operators to submit applications to the CEC directly. The Port has long advocated for this flexibility. We shared information on Concept 4 at our tenant grant workshop that was held on September 10, 2024. Additionally, our leadership team will be reaching out to terminals directly to strongly encourage that they apply.

Thank you for considering our input as you refine the concept for this important funding solicitation. We look forward to continuing our collaboration to advance zero-emission infrastructure at California ports. If you have any questions, please contact Morgan Caswell, Manager of Air Quality Practices, at [Morgan.Caswell@polb.com](mailto:Morgan.Caswell@polb.com).

Sincerely,



for  
Renee Moilanen  
Director of Environmental Planning