

DOCKETED

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Charger Interoperability Needs to include MHD Testing

150 kW is too limiting for MHD:

The project needs to include a program that will effectively support the Medium Heavy-Duty vehicles and the Commercial Battery Electric Vehicle Industry. As currently presented, it does NOT, because the max power rating is limited to support 150 kW. A Class 6-8 vehicle has on average 300-800 kWh with a charging acceptance rate of 350 kW and in the near future upwards of 900 kW. The Heavy Duty sector (Class 6-8) will need the Megawatt Charging System (MCS), the standard will deliver up to 1250 V and 3000A for Class 6, 7, & 8 commercial vehicles, and be used for buses, aircrafts, or other large battery electric vehicles (BEVs) with large battery packs when there is an ability to accept a >1MW charge rate. The project should align with the California Advanced Clean Fleet (ACF) and Advanced Clean Truck (ACT) mandates which began in 2024 for ACT and begin in 2025 for ACT ZEV Milestones option. MHD vehicles today need over 150kW.

Reliability Certification of OEM Charger Equipment:

Refer to CARB's MHD Zero Emission Power-train Vehicle Certification (ZEPC) purpose. The performance of charger equipment needs to ensure the repair-ability and diagnostics are reasonably shared to achieve reliability that aligns with the useful life and eliminates a stranded asset due to the OEM going out of business when the equipment is proprietary. This will require support 24/7, recall requirements, spare parts, repairability and access by service vendors to tools and spare parts for a price. Warranty & Network Support are currently being charged upfront (as much as 3-5 years in advance at \$300-\$1,000 per month) and when the services go down or the OEM is longer in business, customers are getting stranded after the State of California has extended rebates for the equipment and projects.

Tom's Truck Center, Lisa McGhee, 11-16-24