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## **EV Realty Comments - Draft 2024 ZEV Infrastructure Plan**

*Additional submitted attachment is included below.*

February 7, 2025

California Energy Commission  
715 P Street  
Sacramento, CA 95814  
Submitted electronically to Docket# 24-TRAN-03

**Re: EV Realty Comments on the Draft 2024 Zero-Emission Vehicle Infrastructure Plan**

Dear California Energy Commission Staff,

EV Realty appreciates the opportunity to provide comments on the Draft 2024 Zero-Emission Vehicle Infrastructure Plan (Draft Plan), and we thank the California Energy Commission (CEC) staff for continuing to take a thoughtful approach to infrastructure planning, incentives, and related policies. Our comments below are limited to the portions of the Draft Plan focusing on charging infrastructure for medium- and heavy-duty vehicles.

**Shared charging hubs are a key part of the solution**

EV Realty appreciates the acknowledgment that that “there are many uncertainties about what a mature MDHD charging system will look like, so it is difficult to prioritize one charging type over another.” EV Realty develops, deploys, and owns high-speed, multi-fleet EV charging hubs for commercial fleets. We entered the market specifically to address the sorts of barriers called out in the Draft Plan, including the fact that many vehicles will not have dedicated depots and that “it may be impossible or impractical to install charging ports at some depots, due to depot size, grid capacity, or cost constraints.” Our charging hubs provide critical charging solutions for fleets that may not be willing or able to deploy their own charging infrastructure due to grid constraints, landlord restrictions, resource limitations, or other operational considerations. We are encouraged by the discussion of these sorts of sites in the Draft Plan.

**Shared charging hubs should be a near-term funding priority**

We generally support the intent to invest in both depot and en route charging, and it is our understanding based on the draft that this includes “high speed local charging ports” in the form of shared hubs serving multiple fleets in a given area. We suggest further discussion on sequencing and prioritization given the needs of the industry and the current capabilities of the technology.

In the near-term, charging is needed in and around freight hubs to enable the local, regional, and short haul applications most primed to electrify. The 2024 National Zero Emission Freight Corridor Strategy calls for such a phased approach, starting with building out charging ecosystems in freight hubs then moving outward from those hubs to connect regions and enable longer trips.<sup>1</sup> The Draft Plan, however, calls for a near-term focus on corridors before turning to depots and local charging. While this strategy

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<sup>1</sup> This strategy, starting with freight hubs and then moving out to connecting corridors, is detailed in the National Zero Emission Freight Corridor Strategy. Joint Office of Energy and Transportation. March 2024, updated September 2024. Available online at <https://driveelectric.gov/files/zef-corridor-strategy.pdf>

may be appropriate for passenger vehicles, the light-duty market has the advantage of widespread access to home charging for the vast majority of early EV owners, in the form of preexisting outlets or relatively low-cost L2 chargers in garages. Truck fleets have no such network of domicile charging.

The Draft Plan also notes that “fleet owners are likely to install charging on their property to charge their fleet vehicles and not likely to build a publicly available charging station because their primary concern is the financial stability of their fleet.” While fleet owners will be more inclined to install their own “behind the fence” charging than they are to build out a public network, many will also be unable or unwilling to install charging at their facilities due to any number of space, cost, grid, or other operational constraints. EV Realty therefore recommends that CEC include funding for shared charging hubs that can serve local fleets as a near-term funding priority.

### **CEC should ensure flexibility in funding solicitation requirements**

While the Draft Plan does not go into detail on potential site specifications or other requirements, there is discussion of some sites as “public.” Requiring full, unmanaged public access at this stage of the market does not align with the desire for operational certainty that fleets are telling us they want. It also adds costs, complexity, and uncertainty to the site. Shared, multi-fleet depots can serve the needs of fleets with cost and operational advantages over pure “public” sites with no access controls. The California Transportation Commission’s SB 671 Clean Freight Corridor Efficiency Assessment highlights the value of “shared depot facilities,” particularly in the near term:

*“As multiple fleets and independent owner-operators will be able to use a shared depot facility, these sites could be considered publicly accessible. A significant portion of medium-duty and heavy-duty trucks may rely on the shared depot model to serve as a central fueling hub, or hub-and-spoke model, and may also rely on opportunity charging infrastructure along their routes. Contracting with a third-party fueling provider can sometimes be more cost effective for fleets than developing their own zero-emission depot. If fleets can save money on infrastructure, it will allow them to invest more in zero-emission trucks.”<sup>2</sup>*

This is a complicated and important topic that we discuss in greater detail in our response to the Request for Information on Medium- and Heavy-Duty (MHD) Zero-Emission Vehicle Public Charging.

EV Realty appreciates the opportunity to provide comments on the Draft Plan. We look forward to continued engagement with CEC on charging needs analyses, solicitation development, and infrastructure deployment across the state.

Sincerely,

Jamie Hall  
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EV Realty  
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<sup>2</sup> SB 671 Clean Freight Corridor Efficiency Assessment. California Transportation Commission, December 6, 2023. Page 38. Available online at <https://catc.ca.gov/-/media/ctc-media/documents/programs/sb671/sb671-final-clean-freight-corridor-efficiency-assessment-dor.pdf>