

DOCKETED

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CalETC's Response to the RFI on MHD ZEV Public Charging

Additional submitted attachment is included below.



February 7, 2025

California Energy Commission
Docket Unit, MS-4
Docket No. 19-TRAN-02
715 P Street Sacramento, CA 95814

Submitted electronically to [https://efiling.energy.ca.gov/EComment/EComment.aspx?
docketnumber=19-TRAN-02](https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=19-TRAN-02)

Re: Medium- and Heavy-Duty Zero-Emission Vehicle Public Charging

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the Request for Information (RFI) on Medium- and Heavy-Duty (MHD) Zero-Emission Vehicle (ZEV) Public Charging. CalETC would like to thank the CEC for all your hard work on developing the RFI and commitment to building a reliable and universal MHD charging network across the state.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, and other industry leaders supporting transportation electrification.

CalETC recommends maintaining flexibility in MHD funding programs to include sites that combine shared private and public charging as well as sites that offer 100% public charging. MHD charging depots that are shared by multiple fleets and have security and access controls are necessary at this early stage of the market, especially in and around freight hubs.¹ New MHD zero-emission trucks and their refueling infrastructure are high value assets that fleets need to keep securely when they are charging at night or when unattended. Shared charging sites can be configured in multiple ways. For example, a site and chargers can be owned and operated by a charging provider who allows fleets to schedule times to charge or offers long-term agreements to fleets for dedicated chargers. Additionally, a fleet owner could also own and operate their chargers and offer

¹ See *Shared Charging Sites: Accelerating the ZEV Market and Delivering Public Benefits*, CALSTART, November 2024, available at <https://calstart.org/shared-charging/>. See also *Shared Charging for e-Trucks: First Steps Toward a Third Way of Charging*, Smart Freight Center, August 2024, available at https://smart-freight-centre-media.s3.amazonaws.com/documents/Shared_Charging_for_e-Trucks.pdf.

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another fleet access to chargers on its site. These shared charging sites allow fleets access to dedicated charging without having to build out their own infrastructure, while increasing the utilization of chargers for charging providers and fleets who have built chargers, improving the return on their investment. The MHD ZEV market will grow more rapidly by giving a variety of applicant types access to the CEC's funding programs.

CalETC also recommends maintaining program flexibility to allow both reservations and first-come-first-serve (FCFS) charging. Charging providers should be allowed to adjust the number of chargers that are used for reservations and those used as FCFS based on the needs of the fleets they are serving. It is unclear at this time what the appropriate mix should be, so CalETC recommends not placing any restrictions or requirements on applicants to provide certain charging styles.

CalETC's above recommendations and the CEC's MHD ZEV programs provide a benefit to the state because they are focused on accelerating the emerging MHD ZEV and charging markets. CalETC has long advocated for a beachhead style approach to regulating and incentivizing the MHD ZEV market because there are certain use cases that are well suited to transition to zero-emission now. By directing funds towards use cases that can be rapidly transitioned it will both demonstrate the viability of ZEVs in the trucking industry and improve the technology so that it can begin to break into other more demanding use cases. Through this market acceleration, California benefits greatly by improving air quality across the state and in the frontline communities that need it most, we reduce greenhouse gas emissions to prevent more severe impacts from climate change, and we grow an economy that has created and will continue to create new businesses and jobs for all Californians.

Thank you for your consideration of our comments. Please do not hesitate to contact me at kristian@caletc.com should you have any questions.

Kind regards,

A handwritten signature in blue ink, appearing to read 'K. Corby', with a stylized flourish extending from the end.

Kristian Corby, Deputy Executive Director
California Electric Transportation Coalition