

DOCKETED

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Voltera CEC MHD RFI Comments

Additional submitted attachment is included below.



February 7, 2025

California Energy Commission
California Department of Transportation
715 P Street
Sacramento, CA 95814

RE: Docket No. 19-TRAN-02

RE: Voltera Comments on Medium- and Heavy-Duty Zero-Emission Vehicle Public Charging

Dear California Energy Commission,

Voltera Power LLC (“Voltera”) is pleased to submit these comments in response to the request for information on medium- and heavy-duty zero-emission vehicle public charging. We appreciate the California Energy Commission’s (CEC) ongoing leadership and these recommendations aim to support the next phase of work and the continued deployment of medium- and heavy-duty infrastructure. This Request for Information is timely and critical to support investment by companies like Voltera to enable medium-and heavy-duty electrification and achievement of California’s electrification goals.

About Voltera

Voltera invests in, sites, designs, builds, owns, operates, and maintains charging infrastructure for fleets and branded charging networks that enables customers to transition to zero emission vehicles (ZEVs) at speed and succeed with them at scale. Voltera has acquired a number of sites across California and currently has 4 operating sites in California across light, medium, and heavy duty segments, with a number of additional sites in various stages of development or exploration.

Voltera offers a Charging Infrastructure as a Service (ClaaS) model—a turnkey solution that encompasses financing, site identification and acquisition, site development, hardware deployment, operations, and maintenance. The ClaaS model can be deployed at Voltera’s sites, or at customer sites. With significant capital investment plans, a team experienced in deploying charging assets, and expertise in critical infrastructure development, Voltera is well-positioned to address the EV infrastructure gap and support the widespread adoption of ZEVs. Serving a diverse customer base, including fleets from rideshare to drayage, Voltera’s strategy is focused on accelerating ZEV adoption by overcoming key infrastructure barriers, including those impacting medium and heavy-duty vehicles.

Comments

Voltera provides the following feedback based on the questions presented by the Commission:

What does the CEC need to consider when developing “public” / en route charging eligibility criteria for CEC funding opportunities?

When establishing eligibility criteria for “public” / en route charging infrastructure within CEC funding programs, Voltera encourages the CEC to align with the National Electric Vehicle Infrastructure program (NEVI) definition of public, namely to “be publicly available or available to authorized commercial motor vehicle operators from more than one company.”¹ This approach will at once enable consistency across critical funding programs, and particularly for medium and heavy duty (MDHD) infrastructure, align with majority industry practice and the operational certainty that fleets seek as they transition to electric vehicles.

Voltera also strongly encourages CEC to take care not to inadvertently discriminate against particular business models or the companies that employ them by developing too granular requirements that motivate riskier private investment. This care will also help ensure that the operation confidence that fleets require as their transition is not inadvertently undermined.

Indeed, for the purposes of this document and CEC’s program guidance, Voltera views “public” charging as “shared charging.” This definition encompasses stations operating on a first-come, first-served basis, stations where certain stalls are reserved for specific fleets, and stations where more than one fleet has contracted access. All these models provide the same public benefits: namely improved air quality, health outcomes, and associated productivity, additional to reduced noise and greenhouse gas emissions. Indeed, stations with contracted access arguably provide the greatest public benefit by motivating maximum utilization and the associated maximization of benefits to local community members and Californians.

In Voltera’s experience, ensuring operational certainty in shared charging infrastructure is priority one to enable fleet transitioning the confidence necessary to enter a new operational and infrastructure/fueling paradigm. Voltera encourages CEC to weigh this heavily in its development of program guidance. Notably, Voltera has primary experience providing this confidence through contracts with fleets. These contracts establish clear terms for access, pricing, payment, maintenance, and the responsibilities of all parties. By formalizing these agreements, infrastructure providers can enable reliable service, reduce disputes, and enhance user confidence, ultimately fostering an efficient and accessible charging network for fleet users. As is largely underway, other key considerations for CEC include pricing/payment, reliability, interoperability, and safety/security.

How should the CEC plan for the state’s future MDHD charging needs to both accommodate fleets that will need access to chargers while en route to a destination (similar to the diesel truck stop model where the ports are fully publicly accessible first-come-first-served) vs. fleets that need certainty that charging will be available and accessible when it comes time to charge (the reservation system model)?

¹ U.S. Department of Energy. (n.d.). *National Electric Vehicle Infrastructure (NEVI) Formula Program*. Alternative Fuels Data Center. Retrieved February 7, 2025, from <https://afdc.energy.gov/laws/12744>

To effectively plan for the state's future MDHD charging needs, Voltera recommends that the CEC appreciate that adopting fleets at this stage of the market all need guaranteed or otherwise high confidence access to infrastructure, whether that be at their own depots, or at shared charging depots operated by companies like Voltera. As mass market adoption occurs and long haul routes are electrified, fleets may have an increasing willingness to charge opportunistically and not know where they will charge when they begin their route or day. At present, contracted access provides maximum fleet charging certainty, with reservation systems, and finally, first come, first served providing diminishing degrees of certainty. Voltera also encourages CEC to appreciate that MDHD fleets may disfavor point of sale payment options, and prefer more secure payment arrangements with infrastructure providers, including the monthly billing that Voltera and many other providers offer.

General Comments on Reservation Systems

A reservation system for shared chargers can be critical to meeting the needs of the trucking industry where contracted access may not be available, helping ensure reliable access and manageable operational efficiency for fleets. Additionally, where contracted access may not be available, integrating reservations with point-of-sale payment systems may be important for fleets and charging providers. However, Voltera encourages CEC to take care not to artificially create or require a system that fleets and infrastructure providers may not prefer. Unintended or inadvertent business model discrimination of fleet operation complication at this stage of the market would not be helpful. At the same time, Voltera encourages CEC to be thoughtful about creating space for fleets and infrastructure providers who may prefer a reservation construct to be able to provide or access it via a subset of CEC funded infrastructure.

Closing

Voltera is ready and willing to act as a resource to this effort and share our industry experience on best practices with the CEC. We encourage the CEC to continue to work with charging companies and fleets to develop sound and complete policy and program guidance. We look forward to collaborating with stakeholders to drive the deployment of reliable, efficient, and accessible charging infrastructure, ensuring that fleets of all sizes can successfully transition to a zero-emission future.

Sincerely,



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