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CALSTART Comments - 2024 Draft ZIP

Additional submitted attachment is included below.

February 7, 2025

To: California Energy Commissioners;

RE: Docket No. 24-TRAN-03; 2024 Draft ZIP

Submitted via docket@energy.ca.gov and CEC e-commenting feature.

CALSTART thanks the California Energy Commission (“CEC” or “Commission”) for the opportunity to respond to its request for comments on its 2024 Draft Zero Emission Vehicle Infrastructure Plan (Draft ZIP).

We believe that if California wants the Advanced Clean Truck regulation (“ACT”) to succeed and to reach its climate and environmental goals, then its charging programs should be aligned with the needs of the industry it is requiring to electrify. In the below comments, we provide discussion of issues which aim to effect this change.

In particular, in the clarification we provide regarding terms like “public charging” or “public and shared charging” do this on the basis of extensive research throughout long histories of transportation and clean technology development, together with extensive consideration of industry views on the matter of charging site business models and operations which we have undertaken in working groups and dedicated meetings on this topic since at least 2020 (and particularly throughout 2023 to 2025). Many of our comments on how, properly defined, controlled access sites which restrict access to the general public, nevertheless precisely deliver public benefits and bring the state closer to its climate goals, involve the points outlined in CALSTART’s “Shared Charging for Market Acceleration” white paper, available at <https://calstart.org/shared-charging/>, which we urge the CEC to consider.

Issues are listed in bold text, with responses next to them.

Best,

Michael Joseph
Senior Manager
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CALSTART



Strengthen the basis of certain assumptions regarding shares of charging, and how to relate these shares to adoption.

Much of the ZIP includes the major assumptions that:

- Most charging will be low-speed depot charging. CALSTART is not certain what the basis of this assumption is in the assessment.
- That the private sector will contribute a lot of the capital outside of depot charging. We believe that the state should consider extensively not just how to deploy enough charging, but how to deepen its partnerships with the private sector around business models..
- That deployment of ports translates to high utilization of infrastructure assets. This is not clear. In addition, assuming most charging will be depot based neatly assumes that most chargers will be utilized most of the time, though this is not certain. Nor do we see any plan for if this should not be the case, and how to increase the utilization of assets in such a circumstance.
- Few assets will involve co-location of fleets. There is no consideration of the benefits of co-locating asset deployments, especially in the early phases of adoption. It is unclear if the plan considers the penalties or costs of deploying 4 sites where 1 site could be co-located.

Consider including shared charging and hybrid-public sites as significant contributors to the various shares of public charging. Avoid needlessly multiplying distinctions in charging behaviors. Do not restrict the range of charging options by geographic distinctions

- Local high-power charging is a geographic distinction. This is not ideal, and requires more feedback from industry to become a general category of charging.
- We recommend shared charging be considered a viable option for many charging solutions: see CALSTART's "Shared Charging for Market Acceleration" white paper, available at <https://calstart.org/shared-charging/>.
- The distinction between "depot and high speed local charging" and "corridor charging" doesn't make much sense. These are geographic distinctions. They are not reflective of utilization, but of issues of devoting certain amounts of support to charging speeds in certain geographies.
- The state should consider the following in making distinctions:
 - Faster charging speed is nearly always prioritized by fleets (which incentivizes a co-location of assets);
 - Slow charging makes up the remainder or fills in the gaps.

Most charging sites may be managed or controlled access.

- Assume most non-depot charging sites for MD or HD vehicles can be considered "managed" or "controlled access" by default (i.e. significant amounts of charging in the

HD/MD space should be assumed to be at controlled access sites, like any freight facility is); which means most access is managed (including depot access);

- Appropriately prioritize these managed access and shared sites below fleet-owned depots but very much above uncontrolled 24/7 open public sites.