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PACT Comments on CEC RFI

Additional submitted attachment is included below.



PACT

February 14, 2025

California Energy Commission
Docket Unit, MS-4
Docket No. 19-TRAN-02
715 P Street
Sacramento, CA 95814-5512

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

I. Introduction

Powering America's Commercial Transportation ("PACT") appreciates the opportunity to submit a response to the California Energy Commission's ("CEC") Request for Information ("RFI") "Medium- and Heavy-Duty Zero-Emission Vehicle Public Charging." PACT applauds the CEC's continued commitment to supporting medium- and heavy-duty ("M/HD") charging infrastructure and engaging with stakeholders to better understand industry needs.

II. About PACT

Powering America's Commercial Transportation ("PACT") is a coalition dedicated to accelerating the deployment of accessible and reliable charging infrastructure to support the M/HD market.¹

Our membership comprises stakeholders across the transportation electrification ecosystem, including leading truck manufacturers, charging infrastructure technology providers and developers, commercial fleets, fleet management companies, and utilities.² PACT is committed to promoting productive, cross-sector collaboration to advance policies and regulations that close the gap between availability of new vehicle technologies and grid readiness. PACT engages nationally with key stakeholders across energy, trucking, and public sectors to plan for a commercial transportation future that leverages innovative, efficient technologies and is economically competitive.

¹ M/HD refers to Class 6 - 8 vehicles, according to the Federal Highway Administration <https://afdc.energy.gov/data/10381>

² PACT membership comprises ABB E-mobility, Amazon, Alpitronic, BC Hydro, BorgWarner, Burns & McDonnell, Chargepoly, Chateau Energy Solutions, Cummins, Daimler Truck North America, Eaton, EV Realty, Forum Mobility, Geotab, Greenlane, InductEV, International, J.B. Hunt Transport, Inc., Mortensen, Penske, Pioneer eMobility, PittOhio, Prologis, Terawatt, Trucurrent, Voltera, Volvo Group North America, and Zeem Solutions.



III. Response to RFI

PACT's primary interest in this RFI is ensuring that the CEC's approach to M/HD charging infrastructure addresses the unique needs of the commercial vehicle industry. M/HD charging infrastructure is distinct from that for light-duty vehicles. M/HD charging sites are major construction projects and have physical requirements which differ from those for light-duty vehicles. Site configuration for M/HD charging requires considerations for ingress and egress, turning radii, various charging cable lengths, pull-through lanes, and often higher charging speeds to support larger batteries in commercial vehicles. There are also significant challenges as it concerns the "make-ready" needs for M/HD charging sites, such as aligning the timelines between when an OEM is able to manufacture and deliver vehicles and when a utility can electrify a site that frequently requires long-lead upgrades.

Moreover, the M/HD segment of the broader EV ecosystem encompasses a wide range of business models and operational use cases. Whereas light-duty vehicle charging is consistent across locations, charging sites for M/HD vehicles may have significant differences in their configurations and power needs across use cases, such as long-haul, depot, and drayage charging.

To accommodate the various needs of M/HD fleets PACT encourages the CEC to be inclusive of shared use charging depots (or "multi-tenant") in program eligibility. Shared use depots are charging depots that are open to multiple authorized commercial motor vehicle operators from multiple companies. This is commonly referred to as "shared charging." Many state-level programs are adopting the shared charging terminology to recognize the unique needs of the M/HD vehicle and charging industry. Recognizing the importance and utility of shared charging will also improve industry-wide certainty. Shared charging offers a "middle ground" between public and private charging that ensures fleets know what to expect from the charging experience, reduces uncertainty, and offers an additional pathway for expanded deployment of M/HD charging infrastructure.

PACT supports expanding eligibility criteria across funding opportunities and other CEC programs to include these shared depots and further recommends providing equal opportunities for funding for shared, private, and public infrastructure. As CEC considers future actions to support the development of charging infrastructure, providing funding opportunities that don't preclude some form of access management will provide added flexibility at this critical and early stage and improve consistency across programs. An expansive network of public, shared, and private chargers will help meet the diverse needs of M/HD EV operators and better reflect current market realities.



PACT agrees with CEC that a mix of managed access (i.e., appointment-based) and first-come, first-served charging will be necessary over time. Regarding first-come, first-served versus reservation-only chargers, PACT advises against imposing specific requirements for a ratio or number for each operational type at charging sites. As the M/HD charging industry is still evolving, early-stage requirements like these are unnecessarily prohibitive. Developers should be afforded the flexibility to determine which model makes the most sense for the vehicles and customers they serve. For example, the need for reserved charging, compared to first-come, first-served charging, may vary based on the location, time of day, day of the week, nameplate capacity, and duty cycle served. Charging needs will not be uniform state-wide. PACT acknowledges that first-come, first-served charging serves the needs of some business models but encourages the CEC to also consider the needs of reservation-based business models, particularly for near-term use cases.

Reservation systems can be a useful tool. For example, reservation systems can provide certainty to the consumer and reduce range anxiety. Where utilized, reservation systems should be user-friendly, feature real time updates on charger availability, and provide notifications for unexpected changes in reservations or issues impacting charger availability. Reservation systems should also be accessible to all fleets and vehicle types.

A steep rate of growth for reliable and affordable M/HD charging infrastructure that is driven by market realities is critical to supporting the evolving commercial vehicle industry. For that reason, PACT does not consider it necessary to establish a certain percentage of chargers available for first-come, first-served as opposed to available for reservation. Public charging necessitates a variety of site designs to ensure market flexibility and that commercial fleets have options to pick the charging model that works best for their business operations.

PACT encourages the CEC to be prepared to evolve over time as the industry matures. CEC should be prepared to update funding eligibility and programmatic guidelines in a manner that aligns with changes in the M/HD EV industry. This will require that the CEC remain flexible and adapt to market conditions as charging needs may change, including as pertains to reservation versus first-come, first-served charging.

Sincerely,

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On behalf of PACT