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CalETC's Comments on Joint Workshop on CFI Program Concepts

Additional submitted attachment is included below.

February 27, 2025
California Energy Commission
Docket No. 24-EVI-01
715 P Street
Sacramento, CA 95814

Submitted electronically to https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=24-EVI-01

Re: Joint Workshop on California Charging and Fueling (CFI) Formula Program Concepts

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the Joint Workshop on California Charging and Fueling (CFI) Formula Program Concepts. CalETC would like to thank the CEC for all your hard work on developing the proposed concepts and your steadfast commitment to building a reliable and universal medium- and heavy-duty (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 supports the proposed concept and the CEC's approach by creating corridor groupings. We appreciate that the initial set of charging and refueling stations must be used and useful for the trucking industry, and therefore, be located in areas that will have ZEV truck traffic. However, we recommend below that the CFI Program includes a category of stations that would provide minimal but sufficient charging to complete zero-emission truck travel along the entire tri-state I-5 corridor. We believe that it remains critical to provide sufficient charging and refueling stations along I-5 to encourage goods movement by ZEV trucks along this vital corridor.

As we recently noted in our response to the Request for Information (RFI) on MHD ZEV Public Charging and to the extent the federal program requirements allow, we recommend 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 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.

Response to Questions requested in the presentation package:

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1) Is the distribution of stations per corridor group and per corridor reasonable?

Given the current market conditions and regulatory uncertainty, the proposed distribution of stations per corridor is reasonable but should include an option for stations to be developed that would enable goods movement along the whole tri-state I-5 corridor. More MHD ZEV activity is centered in California, including more state level incentive money for vehicles and infrastructure, so having the bulk of the stations placed in California makes sense. We support beginning with a more localized charging network to support ZEV trucks around the major shipping ports and corridors along the West Coast and allow natural market development to occur, which will be better for the market in the near term as technology and operational learning matures. These learnings will inform the development of future stations that will complement the contiguous transportation corridor along I-5.

We believe it is important to establish some minimal placement of stations that enable trucks to traverse the entirety of I-5 from Mexico to Canada. Critical in meeting that goal will be charging stations to fuel trucks that need to pass over the two major elevation changes on I-5: the Siskiyou Mountains at the Oregon-California border and the Grapevine in Southern California. Recognizing that the potential usage of stations on the sections of I-5 from approximately Eugene, OR down to Redding, CA and from Santa Clarita, CA, to Lebec, CA may not be as high as those stations located around the ports and larger population centers, we would like to recommend that a new category for stations be established to provide minimal but sufficient charging for these passes. The stations could be downsized to 1MW just to enable travel capability for the expectedly smaller number of trucks that would use them. Given that the economic viability of stations in

[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.

these sections is probably lower and private investment is less likely, use of public funding is critical for their development. As such CalETC recommends that a new minimal size facility category be established to keep costs as low as possible and adjust the number of stations/locations between California and Oregon to create charging facilities that would bridge those major gaps.

2) Should there be a minimum distance between stations?

There does not necessarily need to be a minimum distance between stations, however, it should be recognized that establishing a local corridor would be a good application of the funding. The localized corridors would best be supported by drayage fleets in the port areas moving goods out to distribution centers located further inland. Distances could be set to support the transportation of goods movement according to these localized corridor needs.

3) Should any specific amenities be required? Should any be encouraged but not required?

The currently listed minimum amenities contained in the draft solicitation requirements appear adequate, i.e., good lighting and bathrooms. We recommend making additional amenities optional and given extra points to encourage placement of stations at existing truck centers where regular amenities already exist. Although the flexibility of developing a station at a brand-new site with minimum amenities could be viable, having a station where and existing truck centers are located has the advantages of exposing more members of the trucking community to the technology and creating information sharing that will be important for market development. Thus, stations that provide more industry exposure should be encouraged.

4) What is the optimal station capacity (MW for charging or kg for H2) for a public MHD station?

We support 2.5MW as the minimum capacity, however, we anticipate that future MHD ZEV charging stations will need 10 to 15 MW of power to serve truck traffic. In some service territories, 10 MW is equivalent to one circuit out of a substation, which would be needed to serve a single MHD charging station in the future. Roughly, an average gasoline truck stop would be equivalent to providing about 30MW. However, at this stage in the market we believe that starting at 2.5 MW is sufficient, and we encourage the CEC to consider providing additional points to applicants that provide plans for future proofing their sites for larger capacity buildouts. As always, we strongly recommend that station developers contact their utility early to identify service locations for these large-scale EV charging stations. If a new substation is necessary, the utility will need to determine if a new substation would be feasible at the location or what level of effort would be required to serve multiple primary meters or circuits to the location.

5) Is the requirement of 50% utility power capacity at station opening and 100% within 5 years of agreement execution reasonable?

We agree that this is a good approach for being able to support electrification in a flexible manner and recognizes that full station capacity is probably not needed at commissioning. Additionally, flexible service connections or a phased approach are a good way to address the lack of available capacity needed at the beginning of a stations operations versus the 100% amount

needed after more market development and more ZEV trucks are on the road. We recommend that the CFI program allow applicants to use the 50% capacity requirement or an agreement with their utility. Depending on the project size, 100% of capacity may not be able to be reached in 5 years, so we suggest adding "as soon as feasible" to that requirement.

Continuing Questions from Page 2

2) Is the proposed restriction on additional points for projects in LI/DACs to pre-existing truck fueling sites a reasonable way to discourage creating additional truck traffic in these communities?

Having stations developed at existing truck fueling sites has multiple benefits as previously discussed. One of the most important benefits other than discouraging additional truck traffic is technology exposure to the rest of the trucking industry to support market development and learning dissemination.

6) Beyond being open to the general public, what guidance should be included for reservation systems?

CalETC 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. While interoperability is a high priority in this developing market. Standards development for charging connectors and communication protocols is ongoing. We do not recommend requiring a certain type of reservation system at this time and encourage using a system that is already in use in the trucking industry that has been demonstrated to be user friendly with good customer experience feedback.

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

Kind regards,

Kristian Corby, Deputy Executive Director
California Electric Transportation Coalition