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West Coast Clean Transit Corridor Initiative Comments to 24-EVI-01 West Coast Truck Charging and Fueling Corridor ProjectCFI RFI

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

West Coast Clean Transit Corridor Initiative Comments

The West Coast Clean Transit Corridor Initiative (WCCTCI) would like to thank the California Energy Commission for this opportunity to provide comments on the CFI Formula Program Concepts and would also like to thank the other agencies involved: CalTrans, Oregon Department of Transportation and Washington Department of Transportation for their hard work and success in getting a federal award for this project.

The WCCTCI was founded in 2019 to set a vision to explore the feasibility and support the development of a network of high-power charging facilities that could support long distance corridor travel for light, medium and heavy-duty electric vehicles on the West Coast from Canada to Mexico. Given that this CFI Program captures that vision the WCCTCI and its current member utilities including Cowlitz Public Utility District, Tacoma Power, Seattle City Light, Portland General Electric, Puget Sound Energy, Eugene Water & Electric Board, Pacific Power, and Clark County Public District wholeheartedly support the concept.

Response to Questions requested in the presentation package.

Questions (Page 1)

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

While the West Coast Clean Transit Corridor recognizes and is supportive of more natural MDHD ZEV market development that will mostly likely occur around the major ports on the West Coast, we still believe it is important to establish some minimal placement of stations that enable trucks to traverse the entirety of I-5 from Canada to Mexico. Critical in meeting that goal will be charging stations to meet the challenge of getting over the Siskiyou Mountains at the Oregon-California border. Recognizing that the potential usage of stations on the section of I-5 (approximately Eugene, OR down to Redding, CA) will likely not be as high as those around the ports and higher population centers, the WCCTC would like to recommend that a new category for stations be established to provide minimal enabling support for that section. The stations could be downsized to a minimal level, (recommended at 1MW), just to establish basic strategic travel capability for the West Coast as well as serving as regional charging assets in those rural areas for emergency response and equitable access. Given that the economic viability of stations in this section is

probably lower and private investment is less likely, use of public funding is even more important for development. As such the WCCTC 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 get some bare bones charging facilities in-place to bridge that major gap.

2) Should there be a minimum distance between stations?

Whereas there doesn't need to be a minimum distance between stations, spacing should balance market demand near ports with strategic gap filling in low-traffic corridors.

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

The current amenities for good lighting and bathrooms should be considered a minimum with an additional caveat that the bathrooms need to have a service contract so they will be cleaned regularly (on a similar schedule to regular rest stop bathrooms?). That way bathrooms aren't simply built to meet a requirement then neglected from operational upkeep and cleaning needed to maintain their functionality and usefulness. Additional point scoring for sites with even more amenities such as food access should also be encouraged.

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

At this point in MDHD ZEV market development having 2.5MW stations in the more port centric localized corridors makes sense with higher usage potential and reduced capacity of 1MW for those sections that are bridging the strategic gaps between the higher utilization areas. Additional point scoring for the 1MW stations having upward scalability should also be considered for future flexibility.

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

The WCCTC agrees 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, energy storage, new flexible service connections and charge/demand management technologies should be allowed to help meet the 50% initial power capacity requirements. These new technologies are emerging as important tools for meeting early service requirements and should be encouraged to help keep costs low so more stations get built and more flexibility is allowed to get the necessary electrical service in place.

6) Is the $18 million cap per awardee in public funds reasonable? N/A

7) Should there be a per-site award cap on public funds? N/A

Continuing Questions (Page 2)

1) How can provisions to support low-income and disadvantaged community (LI/DAC) benefits be strengthened? N/A. The WCCTCI values equitable access and infrastructure deployment that benefits disadvantaged and rural communities where it does not further any existing impacts and is a good fit. Provisions for community outreach could strength the acceptance of these new refueling facilities which would be a benefit for the community, the industry and the entire corridor project.

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. N/A

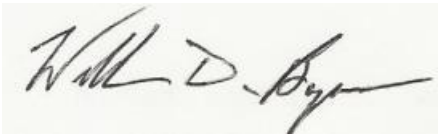
3) How can we facilitate the participation of new entities, small businesses, or enterprises owned by disabled veterans, women, or lesbian, gay, bisexual, or transgender persons? N/A

4) How much time is needed to prepare applications? N/A

5) Any comments about any technical or feature requirements? It is important to maintain the use of open technical standard for charging systems, hardware and support systems to avoid technology lock-in that continues to hamper the industry. It should be expected that a lot of change will occur in this market space going forward and keeping things operational and useful for as long as possible cannot be understated. Adaptability to emerging technologies such as managed charging, flexible service connections and utilization of energy storage should also be encouraged as previously stated.

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

At this point in MDHD ZEV market development, reservations systems for charging are relatively nascent, flexibility and interoperability will be important along with avoidance of any technology lock in. Flexibility in having some ports reservable and others accessible 24/7 should be recognized as a learning opportunity and flexibility is encouraged as information and norms are established to achieve a proper balance. To that extent, optional proposal points for information dissemination on what's learned in this area might be considered to help the industry plan for station utilization in the future.



Bill Boyce
West Coast Clean Transit Corridor Initiative
Secretariat