

**DOCKETED**

<b>Docket Number:</b>	18-HYD-01
<b>Project Title:</b>	Executive Order B-48-18 Workshops
<b>TN #:</b>	223518
<b>Document Title:</b>	Port of Long Beach Comments On Executive Order B-48-18 and New Funding Allocations for Zero-emmission Infrastructure
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Port of Long Beach
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	5/21/2018 4:36:44 PM
<b>Docketed Date:</b>	5/21/2018

*Comment Received From: Port of Long Beach*  
*Submitted On: 5/21/2018*  
*Docket Number: 18-HYD-01*

**On Executive Order B-48-18 and New Funding Allocations for Zero-emission Infrastructure**

*Additional submitted attachment is included below.*



Port of  
**LONG BEACH**

*The Green Port*

May 21, 2018

Jessica Martinez  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

**Electronic submittal via: <https://efiling.energy.ca.gov>**

RE: Comments on Executive Order B-48-18 and new funding allocations  
for zero-emission infrastructure

To Whom It May Concern:

The Port of Long Beach (Port) appreciates the opportunity to comment on the activities proposed for electric vehicle charging infrastructure and hydrogen refueling infrastructure, pursuant to Governor's Executive Order (EO) B-48-18 and new funding allocations for zero-emission vehicle infrastructure. The Port is fully supportive of the Governor's call for a new target of 5 million zero-emission vehicles (ZEVs) in California by 2030, and 250,000 vehicle charging stations and 200 hydrogen refueling stations by 2025. This endeavor supports our own commitment to implementing our 2017 Clean Air Action Plan (CAAP) Update which includes our voluntary goal of deploying all zero-emission trucks by 2035, and transitioning the terminal equipment to zero emissions by 2030.

The Port appreciates that the current insufficiency of in-place infrastructure needed to support zero-emission vehicles and equipment is being recognized. The considerable proposed funding of \$134,500,000 for electric vehicle charging infrastructure and \$92,000,000 for hydrogen refueling infrastructure is highly needed. The funding allocation will be critical to achieve California's aggressive targets and broad reaching goals to improve public health and reduce air pollution from the transportation and goods movement sectors while maintaining a robust economy. As the Port knows first-hand, moving towards zero emissions and deploying the required infrastructure is a costly endeavor, and we welcome the State's commitment to aid our own voluntary objectives.

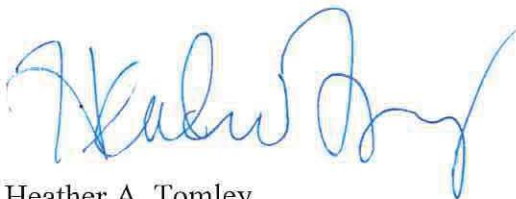
The Port offers the below comments for the proposed funding allocations.

1. **The Port encourages expanding the charging and fueling locations and funding proportions to the Long Beach and Los Angeles areas that see the majority of heavy-duty transport.** This region provides the most opportunities for deployment of zero-emission infrastructure that would support heavy-duty vehicles and equipment. Further, the Port supports the emphasis in the executive order to expand private investment in zero-emission infrastructure in low income and disadvantaged communities.

2. **The Port fully supports the collaborative efforts with regional and local governments to establish consistency and adopt standards.** The current lack of unified charging standards for heavy-duty electrical charging infrastructure significantly hampers the ability to plan and build the necessary infrastructure. We look forward to the Plug-in Charging Station Development Guidebook and update of the 2015 Hydrogen Station Permitting Guidebook that are to be published. Once adopted, the standards should then be communicated to the manufacturers to avoid obsolete equipment and charging outlets.
  
3. **The funding solicitations must include adequate timelines that allow for a proper design, bid, and build process for zero-emission infrastructure.** Constructing the infrastructure to support Executive Order B-48-18 has many other challenges besides expenses and standards. The Port, terminals, and other stakeholders of this endeavor need time to properly design the infrastructure, and electrifying California at such a large scale will be a complex engineering effort requiring years of thoughtful design and construction. Further, we must secure environmental clearances, complete the planning and permitting process, and hold a transparent bid and award process for a construction contractor per the Public Contracting Code, which together will take years. It is also likely that more power will be required from utilities which will add more time to the process, and such extensive installations of electrical infrastructure must be contemplated relative to the current electrical grid's resiliency and capacity to handle such increased loads. *Depending on a project's scope, execution could take 4 to 6 years and insufficient timelines would deter otherwise eager applicants.*

The Port appreciates the opportunity to provide comments on Executive Order B-48-18 and new funding allocations for zero-emission infrastructure. We look forward to continuing to work with CEC and state agencies on advancing our shared goals for a zero-emissions transportation future.

Sincerely,



Heather A. Tomley  
Director, Environmental Planning  
Port of Long Beach