

DOCKETED

Docket Number:	19-TRAN-02
Project Title:	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
TN #:	230573
Document Title:	Grant Farm, Inc dba Momentum Comments - on CEC MHD ZEV Infrastructure Solicitation Concepts
Description:	N/A
Filer:	System
Organization:	Grant Farm, Inc. d/b/a Momentum
Submitter Role:	Public
Submission Date:	11/8/2019 4:44:08 PM
Docketed Date:	11/8/2019

*Comment Received From: Grant Farm, Inc. d/b/a Momentum
Submitted On: 11/8/2019
Docket Number: 19-TRAN-02*

**Momentum Comments on CEC MHD ZEV Infrastructure Solicitation
Concepts**

Additional submitted attachment is included below.



To: California Energy Commission
Christina Cordero

From: Momentum
James Dumont

Date: November 8, 2019

RE: Medium- and Heavy-Duty Infrastructure Funding Concepts

Momentum, formerly known as The Grant Farm, is pleased to submit these comments in support of the California Energy Commission's Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure Funding Concepts (19-TRAN-02). Over its nearly 15 years in existence, Momentum has had the pleasure of ideating, developing, and implementing more than 70 projects funded under the AB 118 Clean Transportation Program. We fully support the goals and objectives of the Clean Transportation Program and are pleased with the future direction and vision for this pivotal component of advancing California's clean energy and transportation goals and the state of sustainable transportation technologies and fuels. Below, please find our comments in support of the proposed Funding Concepts, many of which were discussed and provided in person at the Public Workshop on October 25, 2019.

Please note that our lack of a written comment on Concept #2 and Concept #5 does not in any means signal a lack of support for the proposed capital expense assistance project or those future funding areas to develop the next generation charging and zero-emission fueling technologies, infrastructure for zero-emission rail and marine technologies, and long-range zero-emission Class 8 trucks.

If you have any questions about the following support and suggestions, please do not hesitate to reach out to me at james@buildmomentum.io.

CONCEPT #1: FREIGHT, ZERO-EMISSION VEHICLE INFRASTRUCTURE DEPLOYMENT FOR VEHICLE DEMONSTRATIONS

We fully support this proposed focus area and would encourage the Commission to allocate \$20-\$30 million of the available \$47.5 million in funding for FY 2019-20.

We support the Commission's proposal to require a Preliminary Capacity Check be performed for any proposed projects. Through our transportation electrification projects, we have found that those most likely to remain on time and within budget are those that have a full understanding of the on-site electrical demands and capacity. This Preliminary Capacity Check will help prevent projects from progressing only to find there is an unforeseen requirement for significant upstream electrical upgrades, such as the construction of new transformers or, worse, switchgear or substations.

We would encourage the Commission to make mobile refuelers, for both hydrogen and battery-electric applications, to be eligible for funding under this tranche with the requirement that the motive power of the refueler be provided by a zero-emission powertrain. Mobile refuelers are



commonly used in an array of industrial freight applications, particularly in California's ports. Zero-emission mobile refuelers would enable charging and refueling to be more cost-effectively and efficiently performed and enable these zero-emission transportation fuels to reach into portions of industrial operations that are not well-suited for stationary refueling or recharging infrastructure.

We would also encourage the Commission to remove the bar against funding commercially available technologies, as many of the refueling or charging technologies currently being deployed in light-duty applications could be deemed commercially available but have not yet been tuned and proven for application in the medium- and heavy-duty industries.

CONCEPT #3: ZEV BLUEPRINTS FOR MD/HD VEHICLES INFRASTRUCTURE (INCLUDING SMALL SEAPORTS AND DACS)

As a major project partner and co-author of the Port of Long Beach's Port Community Electric Vehicle Blueprint, we have firsthand knowledge of the importance and challenges of these blueprinting exercises. We fully support this proposed focus area and would encourage the Commission to allocate \$5-\$10 million of the available \$47.5 million in funding for FY 2019-20. We believe these projects, depending upon their breadth and scope, could be exceptionally performed with maximum public project funding in the range of \$200,000 to \$400,000.

We believe the solicitation of these blueprinting projects could be designed for regional-, community-, and/or facility-level infrastructure evaluation and forecasting. These exercises, similar to the Plug-In Electric Vehicle Readiness Plans funded by the Commission, are an integral part to enabling communities and industry to prepare for the future widespread electrification of medium- and heavy-duty transportation.

In order to make this funding be spread more equitably, it may be appropriate to provide funding in tranches based upon geographic sector, fleet size, primary industry, or some other similarly relevant metric—as deemed most appropriate by the Commission. Such an allocation of tranches could enable a diversity of smaller fleet or facility operators to also complete these important blueprinting exercises and support their replicability across the many small fleet and facility operators—often small or underrepresented businesses—operating in California. If this approach is taken, it should be done with a light touch and flexibility to ensure funding is not underutilized in a given tranche.

CONCEPT #4: HYDROGEN RAIL & MARINE APPLICATIONS

We fully support the Commission's proposal to fund the future deployment and demonstration of hydrogen fuel cell rail and marine technologies in freight applications. Having attended and provided input at the Energy Commission's Natural Gas Research & Development Program workshop on funding for the demonstration of the motive unit of these technologies, we believe that it would be most appropriate and least burdensome to applicants and prospective project implementors to combine the funding from the Clean Transportation Program and the Natural Gas Research & Development Program into a single solicitation. This would enable proposed projects to be evaluated as a complete system and avoid the potential issue of one funding source supporting one project and the other supporting a different project, avoiding the potential for funding stranded assets under either program.