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California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket No. 19-TRANS-02: Siemens comments on staff workshop on medium- and heavy-duty vehicle solicitation concepts

On October 25, 2019, the California Energy Commission (CEC) held a workshop to present medium-and-heavy duty vehicle solicitation concepts under the Clean Transportation Program. Staff presented a project overview, including available funding for MD/HD freight vehicles and infrastructure as well solicitation concepts.

In this letter, Siemens respectfully provides our comments on the projects as proposed. Siemens had also submitted comments post the Clean Transportation Program 2019-20 investment update on August 9, 2019.

Siemens is the first corporation of its size to commit to being net-zero carbon by 2030 including a full transition to clean transportation. We are motivated by the goal of driving socio-economic benefits that stem from reducing GHG emissions and adoption of clean energy. Siemens employs over 4,000 personnel in California, generating over $2 billion in in-state sales. With the intent of generating business efficiencies for our customers at workplaces, transit, government, utilities, fleet and other segments, Siemens manufactures/assembles its EV chargers and EVSE electrical components on both coasts of the US with two facilities in Southern California. Siemens' Plug to Grid™ eMobility product portfolio encompasses hardware, software and services which are currently deployed in 35 countries globally – our solutions are geared to maximize the abilities of EVs to act as Distributed Energy Resources, as well as enable the effective harnessing of renewable sources.

Siemens is supportive of the CEC's proposed funding allocation of $30 million related to Medium/Heavy Duty (MD/HD) category. However, we make the following recommendations to make this allocation efficient, from both cost and market needs perspectives.

- Need for charging infrastructure is immediate if the state is to meet its GHG reduction goal from the transport sector. Existing vehicle incentives must have access to supporting infrastructure finance especially in the light of CARB removing infrastructure funding from HVIP. CEC should step in to fill this gap via a matching incentive program.

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- While a wide range of projects can be funded via this initiative, we urge the CEC to focus on available commercialized electrification technologies that meet current infrastructure needs. Other funding sources such as EPIC are available for funding of R&D projects such as pilots of emerging technologies and other "clean" fuel types.

- To add to the above point, we think the CEC should prioritize the infrastructure needs of transit agencies that are using electrification technologies to meet their ZEB mandates. The transit category remains key to meeting the GHG reduction goals.

- To enable rapid infrastructure deployment, CEC should evaluate creating an ongoing funding program versus an annual grant approval process. While CALeVIP may be an example for the CEC to look to, there are several structural issues that plague the program that will need to be addressed including the award process which does not reward creativity or cost efficiencies.

- Such publicly funded charging infrastructure should be based on open technical standards to ensure that there is interoperability between different vendor solutions and that customers are not being "vendor locked-in" from a charger-network perspective. The most widely used, by far, open communications standard for chargers is OCPP.

- Infrastructure should also be open from a connector perspective so that customers have the flexibility to buy vehicles and chargers from different vendors thereby preventing OEM-charger lock-in.

Siemens appreciates the opportunity to comment and look forward to a revised MD/HD solicitation program for 2019-20.

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