

DOCKETED

| | |
|-------------------------|--|
| Docket Number: | 19-AB-2127 |
| Project Title: | Implementation of AB 2127 Electric Vehicle Charging Infrastructure Assessments |
| TN #: | 237017 |
| Document Title: | Volvo Group Comments on AB 2127 Report |
| Description: | N/A |
| Filer: | System |
| Organization: | Volvo Group |
| Submitter Role: | Public |
| Submission Date: | 3/5/2021 4:56:32 PM |
| Docketed Date: | 3/5/2021 |

*Comment Received From: Dawn Fenton
Submitted On: 3/5/2021
Docket Number: 19-AB-2127*

Volvo Group Comments on AB 2127 Report

The Volvo Group appreciates the opportunity to comment on the inaugural AB 2127 staff report: “Electric Vehicle Charging Infrastructure Assessment.”

The Volvo Group is one of the world’s leading manufacturers of trucks, buses, construction equipment and marine and industrial engines. The Group also provides complete solutions for financing and service. The company, which employs more than 97,000 people worldwide, has production facilities in 19 countries and sells products in more than 190 markets. In the United States, it employs more than 13,000 people and has ten manufacturing plants in seven states. In California, the Volvo Group and its dealers employ over 1,000 people with locations in Mountain View, Costa Mesa, Corona, Haywood, Fontana, Stockton, Fresno and La Mirada. The Volvo Group is the only major truck manufacturer that produces all its vehicles for the North American market in the U.S.

As a corporation Volvo Group is committed to long-term solutions that are:

- 100% safe: because health and safety of people is our main priority.
- 100% fossil free, because climate change is the challenge of our generation.
- 100% more productive, because by increasing productivity and efficiency it is possible to meet a growing need for transportation while staying within the boundaries of what our planet can sustain.

As part of this path to offering fossil-free products, Volvo recognizes that the fueling/charging infrastructure needed for those products is critical. We also would reinforce comments in the staff report about the difference between light-duty and medium-/heavy-duty electric vehicle charging. MHDEVs are commercial vehicles used for business and the efficiency, ease and cost of charging is a critical business issue.

For those reasons we support the report’s recommendations and offer ongoing information from the growing knowledge base we are gaining from mobility projects and deployments in California and other states. Our experience with early customers for our electric products could provide valuable feedback and potential directional guidance for what is working in this new marketplace.

From the diverse applications and use cases for our electric vehicles, we can confirm several points made in the report are critical to California’s electrification goals. The importance of community inclusion and participation in infrastructure planning (pg. 62); the greater complexity and need for considering specific vehicle uses and environments (pg. 66); and streamlining permitting ordinances (pg. 68) are elements we would particularly highlight for attention as the state tries to facilitate electric vehicle and infrastructure expansion.

As for the report's recommendations, Volvo believes continued public support for charger deployment—the first recommendation—will be critical to the creation of a successful electric commercial vehicle market. Deeper investment in both private and public charging is needed to strengthen the business case for potential customers.

Regarding the state's modeling efforts, in addition to data from the Volvo LIGHTS project, we would suggest incorporating information from sources such as the UC Davis ITS "Truck Choice Model." That model has strived to incorporate real-world information to ensure it presents a more accurate representation of how real-world fleets purchase commercial vehicles.

We also support the comment that "there is no one-size-fits-all-charger." Based upon our early experiences, we know that virtually every use case is going to require a different infrastructure solution. All efforts aimed at engaging the local utility on community EV blueprints as well as workforce training will help support the electrification process.

The expeditious installation of charging infrastructure is particularly critical in the commercial sector, since any time lag between vehicle delivery and charging availability undermines the fleet's return on investment and increases business risk.

Finally, Volvo agrees that greater vehicle-grid integration and smart charging together with standardization of connectors and communications protocols will be important to the smooth transition to medium- and heavy-duty battery electric vehicles.

We welcome an ongoing dialogue with Energy Commission staff on these issues and encourage you to consider me as a primary point of contact for information from the Volvo Group in order to simplify the information-exchange process.

Respectfully Submitted,

Dawn Fenton
Vice President, Government Relations & Public Affairs
Volvo Group North America