

**DOCKETED**

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*Comment Received From: Heidi Sickler  
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*Additional submitted attachment is included below.*



AMPLY Power, Inc.      [www.amplypower.com](http://www.amplypower.com)  
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September 27, 2021

The Honorable Patricia Monahan  
Commissioner  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

**Re:    AMPLY Power Comments on Request for Information on Medium- and Heavy-Duty Zero-Emission Vehicle Charging and Refueling Infrastructure Potential Loan Program, Docket #20-Finance-01**

AMPLY Power appreciates the opportunity to provide comment on the California Energy Commission's (CEC) Request for Information on a "Medium- and Heavy-Duty Zero Emission Vehicle Charging and Refueling Infrastructure Potential Loan Program." AMPLY Power provides Charging-as-a-Service to de-risk and accelerate the adoption of electric buses, trucks and passenger vehicles by public and private fleets through its simple price-per-mile driven model. AMPLY provides a fully managed charging solution that enables municipal and commercial fleets to deploy zero-emission vehicles (ZEVs) confidently and without hassles. AMPLY handles all aspects of charging operations on behalf of fleet owners, and AMPLY's charging systems are optimized for the lowest electricity costs. AMPLY Power is now delivering 100 percent clean energy to its electric fleet customers. We now ensure only California-sourced renewable power from wind and solar sources is used by our California fleet customers in order to reduce the effects of climate change through the adoption of clean energy.

AMPLY Power appreciates the CEC's focus on the financing tools needed to support accelerated deployment of medium- and heavy-duty (MHD) charging infrastructure. Infrastructure financing is driving MHD vehicle deployment. However, the infrastructure deployment timeline is not decreasing. This means that financing infrastructure should precede MHD vehicle financing. To deliver maximum effectiveness, a CEC Medium- and Heavy-Duty (MHD) ZEV Charging and Refueling Infrastructure Loan Program should allow multi-year decision making (versus grants which encourage single-year decision making). This loan feature is particularly important for fleet customers who may need secure, multi-year loans to finance long-term infrastructure projects. Multi-year decisions allow for forward-pricing of infrastructure (which should decline in cost as volumes increase) and allow for deployment of infrastructure ahead of volume of MHD vehicles. Loans for ZEV infrastructure should also mirror the longevity of MHD vehicles (ten to 12 years) or other renewable infrastructure (20-25 years). Specifically, longer term loans should be matched with lower interest rates that mirror the longevity of MHD vehicles.

Electrifying high-mileage fleets is a high-impact strategy for reducing emissions — they drive more than three times the average distance of non-commercial vehicles and have the potential to reduce GHG emissions per passenger by up to fifty percent per mile. Yet, fleet operators,



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including local school districts, transit agencies, municipal governments and other entities face multiple barriers to adopting ZEVs due to limited resources and bandwidth. To that end, a CEC MHD ZEV Charging and Refueling Infrastructure Loan Program should allow school districts and transit agencies to pay back CEC loans with CEC grant funding to apply towards the principal of CEC loans to avoid stifling the adoption rate. A CEC MHD ZEV Charging and Refueling Infrastructure Loan Program should also allow school districts and transit agencies to pay back CEC loans with federal grant funding or other federal grant resources to help accelerate adoption of zero-emission buses. School districts and transit agencies may prefer low-interest loans over grant funding if they have the option to pay back loans with CEC grant funding.

We also respectfully urge the CEC to establish a MHD ZEV Charging and Refueling Infrastructure Loan Program that would allow fleets to leverage the future stream of Low Carbon Fuel Standard credits (LCFS) they will earn. According to CALSTART, commercial vehicles are expected to earn between \$12,500 and \$24,000 in Low Carbon Fuel Standard (LCFS) credits every year from charging or fueling a ZEV. However, fleets currently lack a means to monetize the future stream of LCFS value and bring it up-front to help finance infrastructure. As CALSTART has previously recommended to the CEC, the CEC could make direct loans to fleet owners based on a third party estimation on the value of LCFS credits earned over the lifetime of the vehicle. The funds would be returned to the CEC as LCFS credits clear the market, thus creating a revolving loan fund from which future loans could be funded.

AMPLY Power is also pleased to support SB 372 (Leyva), legislation passed by the California Legislature this session, which would provide finance and technical assistance for ZEV trucks. Senate Bill 372 would require the California Pollution Control Financing Authority (CPCFA) to develop tools that will focus direct financing on small truck fleets and leverage public funds for large truck fleets to bring in private capital. If enacted into law, we respectfully encourage the CEC to coordinate with the CPCFA on the implementation of SB 372's ZEV truck financing program to ensure zero-emission truck fleets have access to CEC infrastructure financing assistance.

AMPLY Power thanks the CEC for the opportunity to provide comment. We look forward to continuing to collaborate with the CEC to ensure charging infrastructure investments advance California's climate, equity and economic goals.

Sincerely,

/s/ Heidi Sickler

Heidi Sickler  
Director of Policy  
AMPLY Power