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*Comment Received From: Nicholas Blair  
Submitted On: 2/3/2022  
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**ACWA Draft ZIP Comment Letter**

*Additional submitted attachment is included below.*

February 3, 2022

Comment letter submitted via electronic commenting system

California Energy Commission  
Docket Unit, MS-4  
Docket No. 21-TRAN-03  
715 P Street  
Sacramento, California 95814

**Re: Association of California Water Agencies' Comments on Draft Zero Emission Vehicle Infrastructure Plan**

The Association of California Water Agencies (ACWA) appreciates the opportunity to provide public comments to the California Energy Commission (Energy Commission) on the recent Draft Zero Emission Vehicle (ZEV) Infrastructure Plan (Draft ZIP), and the January 20, 2022 public workshop. We appreciate that Energy Commission staff wants to incorporate stakeholder input in the Draft ZIP, and we encourage Energy Commission staff to continue these constructive efforts to develop a feasible, practical and effective Draft ZIP that is informative as a document that also positively informs other rulemakings including the California Advanced Clean Fleets Rule (CARB ACF Rule). We look forward to additional opportunities to work with Energy Commission staff in upcoming public workshops, advisory groups, and follow-up calls.

ACWA represents more than 460 public water agencies that collectively deliver approximately 90 percent of the water in California for domestic, agricultural, and industrial uses. ACWA member agencies provide essential water and wastewater services daily and during emergencies, relying significantly on public fleets, which include Medium and Heavy-Duty Fleet Vehicles (MHD Fleets). Our public water agency members work alongside first responders in emergencies as well as perform routine maintenance that requires unique vehicle specifications and diverse duty cycle needs. Reliable and adequate ZEV related infrastructure is essential to public water agencies' ability to provide essential water and wastewater services for public health and safety.

ACWA and our member agencies' recognize public water agencies' important role in the State's solution to electrify fleet operations, where feasible, in order to reduce greenhouse gas emissions. ACWA is currently active in the development of the CARB ACF Rule. One of ACWA's key priorities in CARB's ACF rulemaking, and now in development of the Draft ZIP, is that the State must ensure the necessary energy generation and electrical transmission infrastructure is available to support ZEV vehicles to meet fleet duty cycle needs. It is essential that the Energy Commission consider the requirements CARB is proposing in the ACF Rule while developing the ZIP. Taking this approach will result in a ZIP that can then be used to inform and improve the CARB ACF Rule.

ACWA's comments below are targeted to the Draft ZIP chapters dedicated to input on MHD Fleets as a market segment. Comments submitted are as follows:

**1. ACWA supports the stated purpose of the Draft ZIP to “support public discussions of pathways to success in the State’s ZEV goals, especially as embodied in vehicle regulations”.**

ACWA is encouraged to see the Energy Commission and CARB staff working to support the cross-agency discussions to inform rulemakings. We appreciate that CARB staff participated in the January 20 workshop and agreed to use the Draft ZIP to inform the CARB ACF Rule. It is essential for state agencies to engage stakeholders, and fellow agencies to align state goals and objectives with rules that work well. ACWA suggests adding language to Chapter 1 of the Draft ZIP to outline the state rules and programs it seeks to inform, including the CARB ACF Rule. Taking this approach will result in a more accurate ZIP that can then be used to inform and improve the CARB ACF Rule.

**2. The Energy Commission should incorporate stakeholder findings documented in the CARB ACF Rule to inform the Draft ZIP assessment of infrastructure needs and grid stability concerns for MHD Fleets.**

It is essential for the Energy Commission to review and incorporate stakeholder input provided in the CARB ACF Rule to inform the stated Chapter 2 section “Assessment of Infrastructure Needs” for MHD Fleets. ACWA member concerns include:

- Charging Infrastructure Availability: ACWA members are concerned that charging infrastructure availability will not meet MHD fleet needs for fleet duty cycles that require operation for 12-16-24 hour days. Initial assessments by ACWA members regarding the design and capabilities of existing and prospective vehicles have raised significant concerns with the factors affecting accurate sizing and installation of charging infrastructure. This concern includes both the charging infrastructure units available for purchase not meeting fleet specifications, and the deployment of charging infrastructure units throughout service territory to meet essential MHD fleet needs. Duty cycles are case specific and depend on the severity of the damage to be repaired (for example, on a water distribution pipeline), and on the location where the damage is located. For unplanned repairs, which require fast mobilization to repair unforeseen damages, the average time that water agency staff will be out in the field can range from 1-2 weeks in areas that are more desolate. This concern also extends to the energy and access to charging required while traveling to worksites and operating for long periods while at worksites, and the need for certain trucks to be outfitted with equipment needing power to run, such as power take-off (PTO) devices. Not having adequate charging infrastructure and reliable ZEVs to handle heavy loads, as well as diverse and rugged road conditions, can be detrimental to public water agencies’ ability to effectively and efficiently respond to and repair water disruption breaks in a timely manner. In addition, ACWA members are concerned about the potential for the first deployment of charging stations in the state to become saturated with vehicles from the private sector, essential public service providers, and the public. This may create conditions where essential public service MHD vehicles are delayed or halted to respond to emergencies due to long wait lines in the first constructed EV charging stations.

- Cost of Charging Infrastructure: ACWA members have significant concerns about the cost public water agencies will incur to construct the necessary infrastructure to charge MHD fleet vehicles. The discussion on charging infrastructure has focused primarily on publicly accessible stations, but not the cost to public agencies to ensure infrastructure will meet their operational demands. While investments in ZEVs and charging infrastructure are cost neutral in the long run, significant upfront resources will be necessary to develop the necessary charging infrastructure to support the ZEV vehicles purchased to comply with the CARB ACF Rule. These necessary investments could require trade-offs and shifting budgetary priorities to cover these increased costs, as well as rate increases for some of our member agencies. Maintaining and adapting California's water system infrastructure to climate change will be essential to reliably delivering water to California's communities, economy, and the environment. We recognize that the need to reduce greenhouse gas emissions from public fleets is essential to mitigating climate change, but shifting budget priorities could impair the ability for small and medium sized water and wastewater agencies to implement other important climate resiliency and multi-benefit projects.

ACWA encourages the State to consider increased funding to support public water agencies adopting ZEV charging infrastructure to support public water agency fleets. We foresee challenges to purchase ZEV infrastructure because funds may not be available through the normal budgeting processes and may even require additional local government Board approval. State funding to support public water agencies' is an investment that will better enable public water agencies to transition to ZEVs, and continue to be partners in California's zero emission energy future.

- Grid Reliability: Grid reliability and the ability to charge essential public fleets must be a fundamental consideration of the Draft ZIP. The electric grid must be capable of reliably handling the additional load of ZEVs and ZEV charging infrastructure. Public water agencies operate with the risk that load-serving entities may enact public safety power shutoffs (PSPS) which infringes upon fleets being able to maintain critical services especially during emergencies. As recently as December 2021, Pacific Gas and Electric public water agency customers experienced a three-week power outage due to heavy storms and were tasked with supplying 100 mutual aid trucks to restore services across northern California. Communities need water and wastewater services to complete essential services, and especially during emergencies.

ACWA encourages the Energy Commission to make available its Electric Vehicle Deployment and Grid Evaluation (EDGE) tool as soon as possible so that stakeholders can properly identify areas where the grid requires upgrades to mitigate grid reliability concerns. Californians have witnessed increased usage of PSPS over the past few years to mitigate wildfires. As California continues to electrify, it is essential to plan for events when outages occur that prevent charging to carry out essential fleet needs.

**3. Deployment plans should include strategies to directly address the Assessment of Infrastructure Needs for both short term and long-term actions to deploy ZEV Infrastructure for MHD Fleets.**

The Energy Commission should directly respond to issues raised in Chapter 2 section “Assessment of Infrastructure Needs” to construct short term and long-term strategies to ensure that the challenges identified are addressed in the State’s plans to electrify fleets where feasible, including the issues identified above. It is infeasible to deploy and rely upon ZEV fleets without complete confidence in the charging infrastructure required to complete fleet duty cycles is available. Strategies must address charging infrastructure unit availability, cost of deployment, grid accessibility and reliability, and the ability for MHD fleets to maintain critical public services during emergencies.

ACWA encourages the Energy Commission to provide further details on how many ZEV and Hydrogen infrastructure chargers the State intends to add to the grid by the year 2030 to meet the projected 5 million ZEVs in California as required by former Governor Brown’s Executive Order B-48-18. We believe addressing the 2030 goal will be instrumental in better understanding the work needs to be done in both the short and longer term to deploy ZEVs in California.

We appreciate the opportunity to comment on this important rulemaking. Please do not hesitate to contact me at [nickb@acwa.com](mailto:nickb@acwa.com) or (916) 669-2377, if you have any questions regarding ACWA’s input.

Sincerely,



Nicholas Blair  
Regulatory Advocate II

cc:

The Honorable David Hochschild, Chair, California Energy Commission  
The Honorable Siva Gunda, Vice Chair, California Energy Commission  
The Honorable Karen Douglas, Commissioner, California Energy Commission  
The Honorable Andrew McAllister, Commissioner, California Energy Commission  
The Honorable Patricia Monahan, Commissioner, California Energy Commission  
The Honorable Liane Randolph, Chair, California Air Resources Board  
The Honorable Sandra Berg, Vice Chair, California Air Resources Board  
The Honorable Davina Hurt, Board Member, California Air Resources Board  
The Honorable E. Joaquin Esquivel, Chair, California State Water Resources Control Board  
Mr. Drew Bohan, Executive Director, California Energy Commission  
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