

*Comment Received From: Truckee Donner Public Utility District
Submitted On: 2/7/2022
Docket Number: 21-TRAN-03*

on Draft Zero Emission Vehicle Infrastructure Plan

Additional submitted attachment is included below.



General Manager

Brian C. Wright

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February 4, 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: Truckee Donner Public Utility District Comments on Draft Zero Emission Vehicle Infrastructure Plan

The Truckee Donner Public Utility District (TDPUD) 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). TDPUD also appreciates the opportunity to participate in the January 20, 2022 public workshop where we provided direct comments and benefitted hearing from CEC and CARB staff along with other stakeholders.

TDPUD encourages Energy Commission staff to continue these collaborative efforts to develop a feasible, practical and effective Draft ZIP. It is also critical that the final ZIP accurately informs other rulemakings including the California Advanced Clean Fleets Rule (CARB ACF Rule). TDPUD has been actively engaged in helping the State achieve important climate initiatives and goals but these efforts must be timed with the availability of viable technologies and must not jeopardize the ability for electric and water utilities to respond to emergencies, operate and maintain critical infrastructure, and protect public safety.

TDPUD is a public, not-for-profit, community-owned electric and water utility serving ~15,000 connections in the great Truckee area. TDPUD relies heavily on public fleets for our operations, which include Medium and Heavy-Duty Fleet Vehicles (MHD Fleets). TDPUD works alongside first responders in emergencies and all of our vehicles must be able to perform in our mountainous, harsh environment and operate in the field for multiple days without access to the grid. The Truckee region received over 20' of snow (along with rain and ice) during the historic December storms with our equipment and crews working 24/7 for over two weeks to restore critical electric and water services. While our average electric outage was 20 hours, we did have areas out for over one week. It should be noted that PG&E had significant areas out for over three weeks.

TDPUD relies on a highly specialized fleet with customized equipment and diverse duty cycle needs. Reliable and adequate ZEV's, along with the related infrastructure, is essential to public water and electric utilities' ability to provide essential services for public health and safety. In planning for ZIP, it is essential that the CEC have a clear roadmap of fully commercialized ZEV MDH electric and water utility trucks along with the required charging infrastructure to meet utility needs.

The above comments were made from the perspective of a specialty MDH public fleet operator. As an electric utility, TDPUD must plan for and invest in the significant load growth that will come with



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widespread adoption of Electric Vehicles (EVs). TDPUD has responded effectively to the significant adoption of passenger EV's in Truckee and, today, we serve over 20 DC Fast Chargers operated by Tesla, Electrify America, EVGO, and ChargePoint. TDPUD also owns and operates five Level 2 Public Access Charges at three locations across Truckee along with serving the growing number of in-home chargers.

It is important to note that TDPUD has been able to effectively serve this fast growing load because the vehicle specifications and associated charging infrastructure are well defined. Given the CARB ACF proposed procurement mandate slated to start at the beginning of 2024, TDPUD needs to be planning for this new load. However, there are no fully commercialized MHD ZEV vehicles available today (nor are specifications available for such vehicles) along with a clear State roadmap to the charging infrastructure needed. We encourage CEC and CARB staff to work closely together to produce a viable roadmap of electric and water utility MDH ZEV commercial availability along with the needed charging infrastructure. This is critical for electric utility load forecasting, resource planning, and the timely installation of distribution upgrades.

TDPUD has been working closely with the Association of California Water Agencies (ACWA), the California Municipal Utilities Association (CMUA), and the Northern California Power Agencies (NCPA) to support electric and water agencies' important role in the State's solution to electrify fleet operations, where feasible, in order to reduce greenhouse gas emissions. In development of the CARB ACF Rule, and now this Draft ZIP, it is critical that the State ensure the necessary energy generation and electrical transmission infrastructure is available to support ZEV vehicles to meet fleet vehicle duty cycle needs. It is essential that the CEC consider the requirements CARB is proposing in the ACF Rule while developing the ZIP and vice versa.

TDPUD supports the comments provided by ACWA on February 3, 2022 as they relate to MDH fleets:

1. Supporting 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".
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.
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.

Thank you for the opportunity to comment on this important rulemaking. Please do not hesitate to contact me or TDPUD's Steven Poncelet (stevenponcelet@tdpud.org, 530-582-3951) if you have any questions regarding TDPUD's input.

Sincerely,



Brian Wright
General Manager

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cc: Mr. Nick Blair, Association of California Water Agencies
Mr. Frank Harris, California Municipal Utilities Association
Ms. Emily Lemei, Northern California Power Agency



American Public Power Association

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