

DOCKETED

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*Comment Received From: Vincent Pellecchia
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WAVE Comments on CA NEVI Deployment Plan

Please see attached for WAVE's comments on the CA NEVI Deployment Plan.

Additional submitted attachment is included below.



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June 28, 2022

Ms. Barby Valentine
Director's Office of Sustainability
California Department of Transportation
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Mark Wenzel
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California Energy Commission
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Re: WAVE Comments on California's Deployment Plan for the National Electric Vehicle Infrastructure Program - Docket #22-EVI-03

Dear Ms. Valentine and Mr. Wenzel:

WAVE (Wireless Advanced Vehicle Electrification) appreciates the opportunity to comment on California's Deployment Plan for the National Electric Vehicle Infrastructure (NEVI) Program (Deployment Plan).

As a manufacturer of charging solutions for medium and heavy-duty (MHD) electric vehicles (EVs), WAVE appreciates the time and effort the California Energy Commission (CEC) and the California Department of Transportation (Caltrans) put into the Deployment Plan. However, although WAVE recognizes that much of the substance of the NEVI Program implementation at the state level is defined by the Federal legislation authorizing this program, WAVE still has a few comments about the Deployment Plan.

The Deployment Plan, as noted in the document, "will focus on investments in light-duty vehicle charging infrastructure and will consider projects that can also accommodate medium- and heavy-duty charging infrastructure."¹ The latter part of this statement is the focus of WAVE's comments. Light-duty vehicle (LDV) charging is an important part of the transportation electrification effort but medium- and heavy-duty vehicles (MHDV) should be considered during the rollout. Indeed, the Deployment Plan does state that the California Transportation Commission's (CTC) SB 671 committee recently "discussed the need for alignment of the Clean Freight Corridors with the state's Alternative Fuel Corridors and the Deployment Plan," and that, "[o]utreach and engagement with this committee will continue throughout the ongoing development of California's Deployment Plan."²

We believe this coordination is important, particularly because we expect that the locations selected for charging areas under the Deployment Plan could also be utilized by MDH EVs so long as the proper planning is incorporated into the competitive grant-funding opportunities (GFO) that will be developed by the CEC and the Caltrans. More specifically, we believe that these GFOs should at a minimum request that respondents include, and CEC and Caltrans consider, how a site plan can be easily upgraded in the

¹ Deployment Plan, Page 5.

² Deployment Plan, Page 12.



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future to include charging for MDH EVs. Additionally, these responses should consider how these future upgrades can be done in a technologically neutral way; for example, allotting space and even infrastructure improvements that will allow MDH EV charging technologies like wireless inductive charging, as well as plug-in.

It is WAVE's position that the future of MDH EV charging will be hands-free, wireless charging systems like those WAVE is deploying throughout the state. As compared to the direct current fast charging (DCFC) chargers slated for deployment under this program, because wireless inductive chargers are flush to the ground with no moving parts, they eliminate problems that can arise with DCFC plug-in chargers, including cables lying around that cause trip hazards, damage to charging guns from misuse and weather impacts, and charger sequence initiation failures. Moreover, wireless charging does not require anything for the driver to do that she doesn't already do; that is, she just parks the vehicle and charging starts.

Accordingly, we suggest that CEC and Caltrans require GFO respondents to consider (1) how to incorporate medium- and heavy-duty chargers into their NEVI sites in the future, including site planning and upgrades during the initial buildout and (2) how to do that planning in a way that does not preclude non-DCFC charging technologies.

Sincerely,

Vincent Pellecchia

Vincent Pellecchia
Director of Policy and Market
Development