

DOCKETED

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DTNA Comments on Accelerating Distribution Grid Connection workshop

Additional submitted attachment is included below.

DAIMLER TRUCK

North America

May 23, 2023

California Energy Commission (CEC)
715 P Street Sacramento
California 95814

RE: Docket #: 23-IEPR-05, Project Title: Accelerating Distribution Grid Connection

Daimler Truck North America (DTNA) submits the following supplemental written comments in response to the May 9th, 2023 workshop.

DTNA is the largest producer of medium- and heavy-duty vehicles in North America. DTNA is fully committed to supporting the emerging zero-emission vehicle (ZEV) market; we expect these technologies to play a significant role in the future of commercial transportation, and know they are a vital contributor to lowering NOx and GHG emissions. DTNA is investing heavily in the development of electric vehicles. We currently offer battery electric school buses, walk-in van chassis (Class 5/6), as well as heavy-duty (Class 8) trucks for sale, and we are preparing for the market introduction of an all-electric medium-duty (Class 6/7) truck. DTNA – in partnership with Portland General Electric (PGE) – is proud to have built the first-of-its-kind public charging island for commercial ZEVs in Portland, Oregon. In addition, DTNA launched a joint venture focused on public charging & refueling ([Greenlane](#)) to help in the acceleration of infrastructure that meets the needs of medium- and heavy-duty vehicles. Finally, DTNA has an expert eConsulting team dedicated to supporting fleets with all aspects of the ZEV transition, including site design and interfacing with utilities. Therefore, DTNA is uniquely positioned to offer insights into Medium- and Heavy-duty (MHD) transportation electrification.

DTNA commends the CEC for organizing this Workshop on Distribution Interconnections. Addressing distribution interconnection timelines and processes is imperative for achieving the State of California’s transportation electrification and carbon reduction goals.

In order for the transition from diesel to zero-emission (electrification) transportation to occur, there is a three pillar key principle DTNA follows:

Vehicle Technology x Cost Parity x Infrastructure = Successful Transition

If any one of those key factors fails, the entire “transition equation” fails. If any one factor is “zero”, the whole transition is jeopardized. Right now, DTNA and our customers see infrastructure as the immediate challenge slowing the transition to electric. DTNA is actively involved in addressing all three factors, and appreciates the opportunities for dialog offered by the CEC.

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Distribution Grid Capacity

Transportation Electrification (TE) programs today offer to cover make-ready costs downstream of the Point of Common Interconnection (PCI) or the existing power pole outside the customer's depot. Long term, distribution capacity upgrades must happen upstream of the PCI to enable significant MHD electrification. This infrastructure build out takes the longest, as shown in the Joint IOUs presentation. Many of these sites where depots congregate are located in congested urban areas (i.e. Inland Empire) where existing substations don't have enough space inside the fence for more transformers and equipment. This means looking for new sites, and bringing in transmission lines to feed them. As stated in the workshop, this will take many years (8-10 years). If the state's carbon reduction goals are to be achieved, and manufacturers and fleets are able to sell and adopt electric vehicles at CARB's required pace for 2024 and beyond, California's utilities need to start land and ROW (right of way) acquisition, and construction today. DTNA urges all CA utilities and their regulatory boards to incorporate MHD charging depot locations and truck travel data into their Distribution System Plans by year-end 2023, and get substation construction started in early 2024. Waiting for a submitted application and pursuing an incremental additions approach to the distribution grid will only mean that California will not be able to meet its carbon reduction goals.

We further believe the risk of stranded utility assets is minimal. Substation equipment can be transported on trailers to other locations - a common utility industry practice today.

The Energization Process

On the energization process, we advocate for utilities to provide a "date certain" grid capacity energization date to fleets who are ordering zero-emission trucks. This allows fleet customers and OEMs to plan the production and delivery date of vehicles without risking having stranded vehicle assets or seeking alternative onsite generation to charge the vehicles. It also allows fleets to better utilize vehicle incentive programs, which often have specific timelines for implementation. While the permanent construction is taking place, we urge utilities to offer connections to the grid on a temporary basis (aka temporary construction power). DTNA believes the current process is too sequential, and urge the utilities and their regulators to allow for more concurrent work processes.

DTNA estimates California will see a significant uptick in zero-emission vehicle adoption between 2025 - 2030 as mandated by the ACT, ACF and the EPA's recently proposed Greenhouse Gas Phase III regulation. Using the current energization or interconnection process, utilities are going to struggle to meet customer needs in a timely manner. We support ProLogis's recommendations that other measures, such as temporary service, shifting loads to other feeders, etc. - all standard utility practices in utility tariffs and schedules, and already approved by the CPUC or individual governing bodies (in the case of the muni's) - become standard utility practice in delivering interim grid capacity to depots trying to meet these mandates while the utilities build out the more permanent grid capacity.

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Energization and Interconnection are not mutually separate. Fleets and emerging third-party service providers are looking to integrate on-site solar and energy storage in their plans in efforts to minimize the demands they place on the grid. Unfortunately, these projects are disqualified from participating in current IOU TE programs that provide incentives towards EVSE-related make-ready costs. They also end up in separate work queues at the utility, which are not well coordinated and deter fleets from adoption.

DTNA thanks the CEC for the opportunity to provide feedback on accelerating distribution grid connection and looks forward to continuing collaboration with the agency to enable widespread transportation electrification.

Sincerely,

A handwritten signature in blue ink that reads "Alissa Recker". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Alissa Recker
Engineer, Compliance & Regulatory Affairs