

DOCKETED

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*Comment Received From: Adam Browning
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**RE 22-EVI-03 2024, Update to the National Electric Vehicle
Infrastructure Plan**

Additional submitted attachment is included below.



May 28, 2024

California Energy Commission
715 P Street
Sacramento, CA 95814

RE: 22-EVI-03 2024, Update to the National Electric Vehicle Infrastructure Plan

Dear California Energy Commission,

Thank you for the opportunity to provide feedback and update the California National Electric Vehicle Infrastructure (NEVI) Infrastructure Plan to include funding for medium- and heavy-duty truck (MHD) charging. Forum Mobility (Forum) supports the CEC's continued investments in zero-emission transportation infrastructure, which is critical to ensuring the State continues to improve air quality, reduce emissions, improve transportation systems, and reach our climate goals.

Forum Mobility, headquartered in San Francisco, California, provides turn-key zero-emission trucking solutions to help accelerate the deployment of zero-emission drayage trucks throughout California. Many smaller fleets and independent owner operators face barriers to adoption, including awareness of zero-emission vehicle options, the high up-front cost, navigating the incentive programs, and installing the associated infrastructure. Forum helps overcome these barriers to adoption by developing, building, and operating the charging infrastructure, as well as purchasing and leasing class 8 zero-emission electric trucks – with the ability to secure available incentives to pass along to the truck driver or fleet owner. Forum provides a one-stop solution for a monthly fee for 'charging as a service' and/or 'truck as a service.' We currently have 8 depots in mid-to-late stages of development that will support roughly 600 trucks in and around the ports of Oakland, Long Beach, and Los Angeles, and along corridors to common freight destinations.

Extrapolating from California Energy Commission analysis prepared pursuant to AB 2127, in order to achieve sufficient charging infrastructure necessary to meet the state's zero emission vehicle mandates, California will need to install an average of over 60 MHD chargers a day, every day, for decades. Unfortunately, the state is currently nowhere near that speed nor scale of infrastructure construction. In order to accelerate the deployment of zero-emission trucks and help California achieve its MHD zero-emission vehicle goals and regulations, particularly for small fleets and independent operators, there is a significant need to increase investments supporting ZEV trucks and infrastructure. We respectfully request the CEC dedicate at least \$200 million in NEVI Formula Program funds to build infrastructure for MHD vehicles in future solicitations.

Additionally, we appreciate the recognition that MHD use cases, operational considerations, and charging needs are different than light-duty. In the event that these funds are dedicated to

the MHD sector, we respectfully request adjustments to future NEVI solicitations for MHD charging requirements. We make the following recommendations:

1) Expanding eligible geography

Please consider expanding siting eligibility beyond the current one-mile limit from a corridor. There are several good reasons for doing so, but one of the most significant is that it will help with speed and affordability of deployment. Parcels of land with access to sufficient grid capacity (many depots will need between 2-15 MW) on distribution feeders is very limited, and as broad an area as possible would be helpful to expand depot siting opportunities, especially when further factoring zoning and egress/ingress requirements. During the consideration of the California Air Resource Board's Low Carbon Fuel Standard capacity crediting program, which proposed an alignment with NEVI's 1-mile limit, several utilities (with Southern California Edison being the most pointed) provided commentary to the effect that according to their analysis, sites with sufficient hosting capacity were extremely limited in the 1-mile corridor, and they accordingly recommended expanding to at least 5 miles¹. We agree.

2) Amending definition of "publicly available."

It is important to recognize that the usage and needs of MHD vehicles are very different than passenger vehicles, and policy must be adapted accordingly. Specifically, working trucks that deliver freight need to have a guaranteed spot to charge at the end of a duty cycle in order to be ready for the next, and need to be able to schedule mid-route charges rather than show up at a depot and wait. Guaranteed access and schedulability of charging are services that freight businesses need – and in order to provide them, third-party depots must be able to have control over access. In addition, safety considerations will require both some monitoring and restrictions on access as well as training on safe utilization of charging equipment. Therefore, we suggest a definition of "publicly available" that accommodates multi-fleet shared depots.

Forum appreciates the opportunity to provide input on future NEVI grant funding opportunity and urges the CEC to include MHD vehicle infrastructure. This funding will help fleets accelerate the introduction and deployment of zero-emission technologies to meet California's long-term air quality, carbon neutrality, petroleum reduction, and climate change goals. We look forward to continuing to work with CEC and other stakeholders to accelerate the deployment of clean transportation and freight throughout the state.

Sincerely,

Adam Browning
EVP Policy and Communications
Forum Mobility

¹ <https://ww2.arb.ca.gov/form/public-comments/submissions/11986>