

DOCKETED

Docket Number:	19-TRAN-02
Project Title:	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
TN #:	258205
Document Title:	CalETC's Comments on MHD ZEV Infrastructure Solicitation Concepts
Description:	N/A
Filer:	System
Organization:	CalETC
Submitter Role:	Public
Submission Date:	7/30/2024 3:43:20 PM
Docketed Date:	7/30/2024

*Comment Received From: CalETC
Submitted On: 7/30/2024
Docket Number: 19-TRAN-02*

CalETC's Comments on MHD ZEV Infrastructure Solicitation Concepts

Additional submitted attachment is included below.



July 30, 2024

California Energy Commission
California Department of Transportation
Re: Docket No. 19-TRAN-02

Submitted electronically to [https://efiling.energy.ca.gov/EComment/EComment.aspx?
docketnumber=19-TRAN-02](https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=19-TRAN-02)

Re: Staff Workshop on Medium- and Heavy-Duty ZEV Infrastructure Solicitation Concepts

The California Electric Transportation Coalition (CalEETC) appreciates the opportunity to provide comments on the Staff Workshop on Medium- and Heavy-Duty (MHD) ZEV Infrastructure Solicitation Concepts held on July 16, 2024. CalEETC would like to thank the CEC for all your hard work on developing the solicitation concepts and commitment to expanding access to reliable MHD EV charging infrastructure across the state.

CalEETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalEETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, autonomous electric vehicle fleet operators, and other industry leaders supporting transportation electrification.

CalEETC believes that the CEC's MHD solicitation concepts are integral in meeting the charging infrastructure needs to ensure California meets its zero-emission goals and that the Air Resources Board's (ARB) MHD regulations are successful. The CEC's 2022 Integrated Energy Policy Report Update used the ARB's ambitious Advanced Clean Trucks and Advanced Clean Fleets Regulations as a baseline to estimate that there will be about 155,000 MHD EVs in 2030 and 377,000 in 2035. The CEC's second AB 2127 report estimated that "these vehicles will require 109,000 depot chargers and 5,500 en route chargers in 2030, which grows to 256,000 depot chargers and 8,500 en route chargers in 2035."¹ To meet these goals, CalEETC supports the CRITICAL PATHS and ZEV Port Infrastructure solicitations. These solicitations are critical to meeting the charging needs of California's zero-emission truck fleet.

¹ P. 7, *Assembly Bill 2127 Second Electric Vehicle Charging Infrastructure Assessment: Assessing Charging Needs to Support Zero-Emission Vehicles in 2030 and 2035* Available at: [https://www.energy.ca.gov/publications/2024/
assembly-bill-2127-second-electric-vehicle-charging-infrastructure-assessment](https://www.energy.ca.gov/publications/2024/assembly-bill-2127-second-electric-vehicle-charging-infrastructure-assessment)

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CalETC recommends removing some of the requirements of the CRITICAL PATHS solicitation. Specifically, the requirement that the applicant propose two charging sites no farther than 125 miles apart and that the station be within 1 mile from the corridor segment's off-ramp. We recognize that these characteristics would be favorable for proposed MHD charging sites, but we recommend that these characteristics be awarded points instead of being required on the application. Certain applicants may not have enough capital to propose two sites and cover the required match funding, which would bar them from applying for funding, even if they already procured favorable property for the project. Additionally, requiring the site be less than 1 mile from an off-ramp is too restrictive and could eliminate the use of sites that have other beneficial characteristics. For example, sites that are closer to grid infrastructure or circuits with available capacity. Therefore, we recommend these characteristics be removed as requirements, and instead, awarded points as part of the evaluation process.

In the ZEV Port Infrastructure Solicitation, CalETC supports covering the cost of utility upgrades if they are not covered by existing utility programs, but we do not recommend awarding points for this characteristic or making it a requirement of the solicitation. We support the solicitation's goal to address grid capacity at the ports and support funding projects that seek to accomplish that goal. However, if there are charging or refueling projects at or near the ports that can be built by using the existing grid capacity, we recommend that those projects also be scored favorably by this solicitation. Projects that can be built without utility side grid upgrades would likely be lower cost and the quickest to complete. Given the state's ambitious electrification goals, we should prioritize funding projects that can be energized quickly while larger grid upgrades can be completed.

Thank you for your consideration of our comments. Please do not hesitate to contact me at kristian@caletc.com should you have any questions.

Kind regards,

A handwritten signature in blue ink, appearing to read 'K. Corby', with a stylized flourish extending to the right.

Kristian Corby, Deputy Executive Director
California Electric Transportation Coalition