

February 28, 2022

Stephanie Palmer
Air Resources Engineer
California Air Resources Board
Zero Emission Vehicle Market Advancement Section
Submitted via Web: Comment Submittal Form (ca.gov)

Re: Comments on the EVSE Technology Review

Dear Ms. Palmer,

The Port of Long Beach appreciates the opportunity to provide comments on the February 2021 “Electric Vehicle Supply Equipment Standards Technology Review” (Technology Review). As you know, the Port aims to transition its heavy-duty drayage truck fleet to zero emissions by 2035. Achieving this ambitious goal will require a significant number of new charging stations, many of which will need to be publicly accessible to support independent owner operators without a home base for overnight charging. The Port is concerned that the Electric Vehicle Supply Equipment Standards regulation (EVSE Regulation) could inhibit the deployment of heavy-duty truck charging in this very nascent market, an impact that is not evaluated in the Technology Review. The Port strongly urges the California Air Resources Board (CARB) to clarify whether the EVSE Regulation applies to charging stations dedicated to heavy-duty trucks, and if so, to evaluate the regulation’s potential impacts on the heavy-duty public charging market.

As it reads, the EVSE Regulation does not seem to exclude heavy-duty charging stations from the requirements. The regulation refers only to “electric vehicles” and “Electric Vehicle Service Provider(s)” as the “entity responsible for operating one or more networked or non-networked EVSE” (Final Regulation Order). The Statute Providing Authority and the supporting regulatory documents, however, exclusively address and analyze *light-duty vehicles*. The first bullet point of Senate Bill 454 finds that “California is the nation’s largest market for cars and *light-duty* trucks” (emphasis added), suggesting that heavy-duty truck charging was not contemplated in the statute’s adoption. Further, the Initial Statement of Reasons contains references only to light-duty trucks and does not analyze charging for heavy-duty trucks. As the EVSE Regulation could impede the zero-emission heavy-duty truck market, **the Port strongly urges CARB to clarify whether the EVSE Regulation applies to charging equipment dedicated to heavy-duty trucks.**

If the EVSE Regulation applies to the heavy-duty market, the Port is concerned that its requirements could stifle much needed public charging investments in these early years of the transition. Due to the complexity of public charging for heavy-duty trucks, it is expected that private fleets will be the early deployers of charging infrastructure at their facilities. These fleets should be encouraged to make their charging stations publicly available, at least part of the time, to independent operators who do not have access to overnight charging; the EVSE Regulation requirements, however, may deter fleets from doing so. The reporting requirements alone would likely be sufficient to deter private facilities from making heavy-duty EVSE partially publically available, notwithstanding the added costs and complexity with requiring specific payment methods that may not be the most efficient or compatible with a semi-public heavy-duty truck charging business model.

A recent Port study found the drayage industry will need 4,300 public charging units by 2035 to support the zero emissions transition with only nine units anticipated within the next few years.¹ Public charging units at private facilities will be critical to meeting this need. The Technology Review does not address the EVSE Regulation's potential impacts on the heavy-duty truck market, focusing entirely on passenger-car drivers. If the EVSE Regulation applies universally, the Port strongly recommends that CARB analyze the potential impacts on the heavy-duty market in the Technology Review.

Thank you for giving the Port the opportunity to provide these comments. We are happy to discuss these comments in more detail. If you have any questions, please contact my staff, Leela Rao, at leela.rao@polb.com or 562-519-1560.

Sincerely,



Matthew Arms
Director of Environmental Planning
Port of Long Beach

¹ Port of Long Beach, "Fueling the Future Fleet: Assessment of Public Truck Charging and Fueling Near the Port of Long Beach," September 2021. www.polb.com/zeroemissions