

September 28, 2023

California Air Resources Board
Cc: Clerk of the Board
1001 I Street
Sacramento, California 95814

RE: Joint EV Fleet Infrastructure Parties Comments on Agenda Item 23-8-1: Public Meeting to Hear an Update on the Low Carbon Fuel Standard

Dear California Air Resources Board Members,

The Joint EV Fleet Infrastructure Parties (JEVFIP) appreciate the opportunity to provide comments on the Update on the Low Carbon Fuel Standard agenda item. The proposed changes to the LCFS program, specifically the proposal to create a Fast Charging Infrastructure (FCI) mechanism for Medium- and Heavy-Duty (MHD)_charging infrastructure, represents a significant opportunity to catalyze private sector investment and accelerate the mass buildout of dedicated charging for MHD fleets in order to meet state policy targets. The following comments highlight the Parties' most critical collective input on the proposed changes to the LCFS program.

CARB should adopt a Fast Charging Infrastructure mechanism for Medium and Heavy Duty Fleets

The JEVFIP strongly supports Staff's recommendation for the creation of an FCI mechanism specific to MHD electric vehicle charging infrastructure. The implementation of an MHD-specific FCI mechanism will be critical to meeting California's ambitions targets codified under the Advanced Clean Trucks (ACT), Advanced Clean Fleets (ACF), and other mobile source emissions reductions goals. Meeting these targets is going to require proactive deployment of charging infrastructure, ahead of the vehicle deployment targets in order to provide the necessary market signals and confidence to drive vehicle adoption. An FCI mechanism for MHD can provide the single most effective mechanism for accelerating commercial charging infrastructure build-out over the next 10 years.

The regulation should allow for third-party operated, shared depot sites

A significant share of MHD EV charging will occur at sites that are neither private on-site charging nor fully public charging. Many fleet operators seeking to electrify their vehicles, a) do not own or have the right to make infrastructure upgrades to the sites where vehicles are domiciled, b) lack sufficient land to

install and accommodate charging of MHD vehicles, and c) lack sufficient grid capacity at the site to interconnect chargers in a timeframe necessary to meet commercial and regulatory requirements for electrification.

For these reasons, many fleet operators are turning to 3rd party owned and operated charging depots that provide a charging-as-a-service subscription to multiple MHD EV fleets through either a private, or semi-private model. Multi-fleet EV charging hubs provide the added benefit of increasing overall charging utilization, enabling more vehicles to charge per charging stall without triggering costly system upgrades, thereby reducing the overall cost for both the infrastructure providers and the fleet operators. Additionally, these facilities are fenced and lit, providing security for the vehicles and their cargo, a necessary requirement for fleet operators. These sites play a critical role in enabling MHD fleet and vehicle operators to transition to EVs quickly and cost-effectively, consistent with state Zero Emission Vehicle (ZEV) policies and enable LCFS funding to benefit a broader range of fleet charging applications.

For these reasons, the JEVFIP recommend that the MHD FCI regulatory language include the same principle requirement, with modification, around site access as what has already been proposed in the draft regulatory text for the MHD HRI:

§ 95486.3.(b).(4).(B) ~~“The FSE must be open to vehicles with gross vehicle weight 8,501 lbs and greater. The site must be open to at least two different vehicle fleets trucking companies, meaning that no obstructions or obstacles exist to preclude these vehicles from entering the FSE site premises,~~ and no formal or registered equipment training shall be required for individuals to use the ~~FSE electric vehicle charging infrastructure.”~~

The inclusion of the relevant language will ensure alignment with the two mechanisms in the regulation.

The regulation should expand geographic eligibility to align with vehicle deployment

The draft regulatory language currently states that eligible FSE projects “*must be located in California within one mile of a Federal Highway Administration Alternative Fuel Corridor*”. The JEVFIP recommends modifying this requirement to remove any limitation on geographic deployment of MHD EV charging infrastructure at this time. This modification is necessary to account for location constraints that inhibit

deployment of significant high-powered EV charging infrastructure in certain areas. The challenge with aligning with alternative fuel corridors is that those corridor designations were not intended to specifically account for all forms of goods movement throughout the state. The necessary charging infrastructure that is needed to serve vehicle deployments at ports of entry, marine and rail terminals, and warehousing and logistics hubs should not be discriminated against within an FCI mechanism by a geographic limitation. California-specific ZEV requirements in Advanced Clean Fleets, such as those for drayage, should be reflected in the consideration of eligibility for FCI projects and support the necessary build out of EV charging infrastructure in the locations that medium and heavy duty fleet operators are most actively going to rely on them – these are not always within a one-mile radius of an alternative fuel corridor. Flexibility around locations is also critical to address utility capacity constraints that may severely limit the total amount of infrastructure that can be deployed throughout the state where these projects need to be located to meet the requirements.

Conclusion

The JEVFIP applauds CARB staff for the significant industry stakeholder engagement they have undertaken in the development of the draft proposal. We look forward to continuing engagement with CARB board members, staff, and other key stakeholders to ensure an FCI mechanism for the MHD sector best aligns with needs of the market and California's policy goals.

Sincerely,

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