



February 20, 2024

California Air Resources Board
1001 I Street
Sacramento, CA 95815

Re: Comments of Voltera on the Proposed Low Carbon Fuel Standard Amendments

California Air Resources Board Members and Staff,

Voltera appreciates the opportunity to provide comments to the California Air Resources Board (CARB), in response to the proposed Low Carbon Fuel Standard (LCFS) Amendments. Voltera commends CARB's continued leadership in accelerating the transition to zero emission vehicles (ZEVs), across the light, medium, and heavy-duty sectors. CARB has established a critical portfolio of ZEV regulations, including Advanced Clean Cars II, the Clean Mile Standard, and the Innovative Clean Transit (ICT), Advanced Clean Trucks (ACT) and Advanced Clean Fleet (ACF) regulations, which are driving the ZEV market in a number of segments. Meeting these regulations and achieving a number of other essential ZEV deployment and emissions reductions goals will require a fortified and robust LCFS program. Voltera provides the following recommendations to strengthen the ability of the proposed LCFS Amendments to enable ZEV infrastructure deployment.

I. About Voltera

Voltera sites, develops, owns, and operates strategically located, fit-for-purpose charging facilities enabling our customers to deploy and operate EVs at scale. The company is backed by EQT, a leading global infrastructure investor, that has the capacity and track record to further expand its investment in Voltera, supporting the growth of EV charging infrastructure and the zero-emission vehicle (ZEV) transition.

Voltera provides a charging infrastructure as a service (ClaaS) model. ClaaS is a turnkey solution that includes site identification and acquisition, site development, hardware deployment, operations, and maintenance. Voltera coordinates the entire real estate process for (and often with) customers and develops the site on their behalf. Voltera procures and installs electric vehicle supply equipment (EVSE) hardware and operates and maintains the site, including the EVSE. Reliability, availability, and speed of charging

are typically guaranteed through service-level agreements that Voltera holds with our customers.

Voltera's current initiatives in California include:

- **Goods movement:** Voltera began charging operations at its first Class 8 drayage charging depot in the Los Angeles region, in the fall of 2023. The project is Voltera's first scaled truck site with 65 installed high-powered DC fast chargers (DCFC). Voltera has purchased properties in the Los Angeles and Sacramento regions and is in the process of developing these and purchasing and developing additional properties in these geographies to support medium and heavy-duty goods movement.
- **People movement:** Voltera has purchased and is developing multiple properties in California to support light-duty rideshare electrification, including in San Francisco, and the Los Angeles region, and is evaluating purchasing and developing properties to support medium and heavy-duty people movement.
- **Regulatory:** Voltera is a party to Rulemaking 23-12-008, Order Instituting Rulemaking Regarding Transportation Electrification (TE) Policy and Infrastructure, before the California Public Utility Commission (CPUC). The new Rulemaking is intended to address future utility TE programs and is especially pertinent to these comments based on the potential overlap with LCFS resources. Notably, utilities will be responsible with implementing LCFS holdback credit programs which are the dual jurisdiction of CARB and the CPUC. Voltera intends on engaging in the CPUC setting to discuss a broad array of ZEV matters, including LCFS strategy recommendations. Voltera has also enrolled as a party in Rulemaking 24-01-018, the Order Instituting Rulemaking to Establish Energization Timelines.

II. Comments

Voltera provides these comments as a stakeholder focused on building infrastructure to accelerate ZEV goods and people movement, across the light, medium, and heavy-duty sectors:

- **For light-duty fleets,** the LCFS program will continue to play a critical role in helping the sector with important resources to help accelerate ZEV infrastructure deployment. As the market continues to mature, it is imperative that CARB

maintain the course to support mass light-duty ZEV deployment. This is especially important in support of market segments that do not readily have access to EVSE and ZEVs. For example, it is important that CARB ensures alignment between the LCFS program and the transportation network companies (TNCs), who are compelled to electrify consistent with achieving 100% electric vehicle miles traveled (eVMT) by 2030 under the Clean Mile Standard.¹

- **For medium- and heavy-duty (M/HD) fleets**, it is critical that CARB maintain and expand support for a nascent market. Here, the LCFS program is an essential tool that will help accelerate the transition to M/HD ZEVs to help achieve ACT and ACF mandates. The M/HD market needs this mission-critical support at least in its early stages. According to 2022 data, the sector has seen only 2,300 M/HD ZEVs deployed (1,708 buses, 272 trucks, and 340 delivery vans, respectively).² As such, the LCFS program will be a critical tool to help accelerate market penetration for ZEVs in the M/HD segment.

A. Light-Duty Recommendations

The following sections detail Voltera's recommendations for key modifications of the proposed regulation to better support light-duty fleet deployment.

Maintain the 2.5% cap

From 2026-2030, CARB proposes to lower the cap on prior quarter deficits to 0.5%. Voltera's recommends that the current 2.5% cap continue. Maintaining the provision better aligns with CARB's Scoping Plan, the Advanced Clean Cars II regulation, as well as the AB 2127 report by the California Energy Commission (CEC). These policy drivers outline the need for a substantial build-out of DCFC infrastructure to meet our light-duty ZEV goals. Thus, this is not the time to lower the cap that will in turn lower incentives for deploying public DCFC. Voltera encourages CARB to maintain the 2.5% cap as a tool to encourage continued DCFC deployment.

¹ <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2021/cleanmilesstandard/fsor.pdf>

² California Energy Commission. Total Medium- & Heavy-Duty ZEVs end of 2022. Website Access: https://tableau.cnra.ca.gov/t/CNRA_CEC_PUBLIC/views/MDHDVehiclesPop/MDHD?%3Adisplay_count=n&%3Aembed=y&%3AisGuestRedirectFromVizportal=y&%3Aorigin=viz_share_link&%3AshowAppBanner=false&%3AshowVizHome=n

Create a light-duty Fast-Charging Infrastructure (FCI) provision for EV ridesharing, EV rental, and EV carsharing

CARB proposes various changes to the light-duty FCI provision that will greatly limit areas of deployment.³ In addition, the light-duty FCI provision would remain available only for public EVSE. Voltera encourages CARB to adjust this provision to allow for FCI incentives to be applicable anywhere, especially in scenarios where infrastructure is specifically designated to promote EV access (such as EV ridesharing, EV rental, or EV carsharing). By making this adjustment to allow for FCI incentivization of these sectors, CARB can help embolden parties to more aggressively achieve technological and economically feasible solutions for shared electrification in the TNC, taxi, rental, and carsharing sectors. This adjustment would be especially valuable to provide additional resources to TNCs, which as noted earlier must meet 100% eVMT by 2030 under the Clean Mile Standard. In addition, California has prioritized electric car rentals and sharing as detailed in the 2013 ZEV Action Plan⁴ and EV sharing policies in the 2015 ZEV Action Plan.⁵ As such, Voltera recommends that CARB align resources to support the electrification of these sectors.

B. M/HD Recommendations

With key modifications, CARB's proposed M/HD FCI program can be an effective way to help accelerate the deployment of the charging infrastructure needed to enable future M/HD ZEV deployment. We deeply appreciate CARB's proposal to add an FCI for the M/HD sector, and to make it available for both private and shared fleet depots. The following sections detail Voltera's recommendations for key modifications of the proposed regulation to better support M/HD fleet deployment.

Modifications to the proposed M/HD ZEV infrastructure crediting process are warranted

³ CARB proposes to adjust the program for HRI and FCI to prioritize incentivization for light-duty vehicle refueling in low-income, rural, or disadvantaged communities, and proposes that these investments are more than 10 miles away from the nearest fast charger.

⁴ [https://opr.ca.gov/docs/Governors_Office_ZEV_Action_Plan_\(02-13\).pdf](https://opr.ca.gov/docs/Governors_Office_ZEV_Action_Plan_(02-13).pdf)

⁵ https://www.ca.gov/archive/gov39/wp-content/uploads/2018/01/DRAFT_2015_ZEV_Action_Plan_042415.pdf

Voltera appreciates CARB's proposed inclusion of the new provision, there is a need to strengthen the M/HD FCI program incentives to ensure that they better align with the on-the-ground realities of deploying M/HD infrastructure. Voltera recommends the following adjustments:

- **Adjust the Fueling Supply Equipment (FSE) provision that limits the per site FSE credits to 10.** Voltera encourages CARB to remove this provision. Removing this cap will allow project stakeholders to rapidly scale in the manner necessary to meet the state's M/HD goals and will likely encourage stakeholders to engage in cost reductions from economies of scale that come with investments in larger projects. Voltera encourages CARB to embolden the industry to accelerate deployment of M/HD fleets by removing this cap. If CARB feels that there are strong reasons not to eliminate the FSE cap, Voltera would encourage CARB to consider a higher step-down cap to 30 FSE credits per site, and a potential tiering of further site FSE credits partial credit value to support additional infrastructure deployments. Voltera stresses that many fleets have more than 10 trucks to be transitioned to ZEV, and indeed, the implicated credit support for FSEs adequate to support such fleets is significant.
- **Reduce the 250kW minimum capacity.** Voltera encourages CARB to enable infrastructure developers to provide a variety of solutions to meet market needs, which may or may not meet the proposed 250kW threshold. Moreover, to ensure uniformity with existing and emergent infrastructure programs, and as an alternative to the 250kW threshold, Voltera would encourage CARB to align the LCFS program with NEVI-funded DC fast charge stations, which will have (at minimum) four 150 kW Combined Charging System (CCS) connectors and a minimum total station power of 600 kW.⁶
- **Remove geographic limitations of 1 mile.** CARB proposes to limit the M/HD FCI program to places, "Located within one mile of a ready or pending EV Federal Highway Administration Alternative Fuel Corridor or on or adjacent to a property used for M/HD vehicle overnight parking or has received capital funding from a

⁶ California Energy Commission; National Electric Vehicle Infrastructure (NEVI) Formula Program: Website Access: <https://www.energy.ca.gov/programs-and-topics/programs/national-electric-vehicle-infrastructure-nevi-formulaprogram#:~:text=Each%20NEVI%2Dfunded%20DC%20fast,freeway%20exit%20or%20highway%20roadway.>

State or Federal competitive grant program that includes location evaluation as criteria.” This provision would unduly impact the nascent M/HD market, as these restrictions do not necessarily align with customer and market needs, and equally may not align with some regional initiatives. Moreover, land in urban areas is already scarce, hence further restricting FCI sites will only exacerbate existing challenges. In contrast, removing the one mile from corridor restriction will encourage fleets to deploy based on demand, which potentially will result in faster infrastructure deployment.

- **Clarify the ¼ mile factor and eliminate the 10 MW limits per site.** CARB proposes that: “The total nameplate power rating for all FSEs claiming MHD-FCI credit owned by a single applicant within ¼ mile of an MHD-FCI site cannot exceed 10 MW.” Voltera reads this as there being a ¼ radius component to the number of proposed FSE MHD FCI credits that can be claimed by a single entity. However, this language reading could also result in linking this not to a single entity, but to multiple entities. From Voltera’s perspective, this latter scenario is a direct concern, and in any logical scenario, Voltera recommends removal of the 10MW combined nameplate threshold altogether.
- **Increase the MHD-FCI program deficit to 5% to help California meet state M/HD deployment goals.** The current proposal for the MHD-FCI program is limited to 2.5% of the previous quarter’s deficits. Unfortunately, Voltera needs to stress the nascency of the M/HD market segment and encourages CARB to raise this cap to attract the scope and scale of market investment needed to accelerate the M/HD ZEV market and meet relevant regulations. As identified in the CEC’s AB 2127 analysis, the state will need approximately 2,900 MW by 2025 and 11,600 MW by 2030.⁷ Relatedly, the California Trucking Association estimates that 300-600 DC fast chargers need to be installed every week to meet the state’s 2035 needs.⁸ As such, Voltera encourages CARB to raise the proposed cap to 5% to help meet M/HD infrastructure demands.

⁷ The California Energy Commission’s AB 2127 report uses the HEVI-load model to forecast the number of depot and public chargers required for MHD charging under the AATE3 primary scenario. This forecast predicts the number of chargers and their respective power ratings that will be required in 2025 and 2030, as seen in Appendix-H, Table H-1. The sum of the total MHD charging capacity based on this forecast was calculated to be 2,900 MW and 11,600 MW by 2025 and 2030, respectively, by taking the sum-product of the number of chargers and their respective power rating.

⁸ Chris Shimoda Senior Vice President of Government Affairs California Trucking Association; R.24-01-018 — Public Workshop Discussing the Development of Energization Timing Targets and Processes to Report

Conclusion

Voltera appreciates the opportunity to provide recommendations to CARB's proposed LCFS amendments to better enable effectiveness in the deployment of ZEV infrastructure to support the light, medium, and heavy-duty ZEV sectors.

With the recommended adjustments, Voltera is confident that the LCFS program will continue to provide key resources to the ZEV sector to help it achieve the goals and regulatory compliance of Clean Cars II and the Clean Mile Standard, ICT, ACT and ACF.

Voltera acknowledges that the Board has postponed voting on the proposed amendments. While Voltera acknowledges CARB's need for additional discussion, we urge the Board to move expeditiously to send clear and stable market signals to the ZEV infrastructure sector.

Please reach out with any questions or for clarification regarding these comments.

Respectfully submitted,

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