



February 7, 2025

California Energy Commission  
715 P Street  
Sacramento, California 95814

**RE: Request for Information, Medium- and Heavy-Duty Zero-Emission Vehicle  
Public Charging, Docket #19-TRAN-02**

Dear Commissioners:

NATSO, Representing America's Travel Centers and Truckstops and SIGMA: America's Leading Fuel Marketers (together, the Associations)<sup>1</sup>, submit these comments in response to the ( ) request for information ( RFI ) that seeks to inform the development of eligibility criteria for public charging technologies for medium- and heavy-duty <sup>2</sup>

The Associations are eager to work with the Commission to support the development of MHD EV refueling infrastructure in California through effective public-private partnerships and other incentive programs. Over the past several decades, t leveraged both federal and state incentives to lower the price consumers pay for fuel while simultaneously displacing petroleum-based fuels with more environmentally attractive alternatives. This began with biofuels, renewable natural gas, and other liquid alternative fuels. In

The existing refueling network serving MHD trucks today is a logical place to site alternative refueling infrastructure. are strategically located throughout California where HD refueling demaait h(s)602(g7( )t)-1e,/F2 12 Ti(li)-3(for)6(nia ))TETQW\*nBT/F2 12 Tf



electricity as a fuel. This pricing structure, which exists because of the regulatory scheme in which the utility industry operates, is notable because pricing is set and controlled by local electric utilities, and ultimately public utility commissions. To create a sustainable market for private investment, all market participants should face the same competitive risks and the same pricing for the electricity needed to charge HD vehicles. Non-utility EV charging station owners today must pay retail prices for electricity, *and* demand charges, *i.e.*, additional charges that most commercial consumers are charged to provide reserve capacity. There is no business case for buying at retail prices and selling at retail prices. Cognizant of these regulatory impediments, HD electrification policies should be designed to help the market overcome these structural obstacles.

## **II. Considerations for Potential Eligibility Criteria.**

### **a. *Reservation System Requirements***

The Commission should evaluate applicants for funding programs on a case-by-case basis and allow a wide array of site models to be eligible for funding. In other words, the Commission should neither prohibit, nor mandate, the availability of a reservation system or specific charging

-come, first-

fueling models. The utility and efficacy of reservation systems for MHD fleets or individual vehicles will vary significantly across the State, and the logistics of each fleet operation. As such, the Commission should provide as much flexibility as possible as to whether, and to what extent, funding program participants provide reservation systems for refueling infrastructure. In some use-cases, it may be prudent to allow all chargers to be reserved in advance. In other cases, it may be a better approach to adopt a first-come, first-serve model.

Charging installations that rely on reservation systems run the risk of relying on bookings that are not always honored. Such failures result in substantial operational inefficiencies, including instances where vehicles arrive at unoccupied charging stations only to experience delays due to pending reservations. These inefficiencies are exacerbated by the inherent unpredictability of driver and vehicle arrival and departure times. Further complicating matters is the necessity of accounting for factors such as battery capacity, initial charge levels, thermal management parameters, permissible charge rates, and environmental conditions. The complex logistics of MHD charging demands a highly precise and reliable system to ensure effective resource allocation, which cannot always be assured.

Regardless, each individual charging infrastructure provider will be best suited to identify the facility model that is most conducive to the highest utilization rate of their sites. A top-down, single approach to reservation models will prevent the industry from properly evaluating the efficacy of various public charging models.

### **b. *Public Accessibility***

The Associations generally oppose public incentives subsidizing private -the- charging facilities that benefit a limited universe of consumers. The Commission should resist efforts to direct HD charging investments toward non-publicly accessible locations. These use-cases are less economically challenging: the facilities will generally not need fast chargers and

