

Jamie Hall

My name is Jamie Hall. I am the Director of Policy for EV Realty. We build, own, and operate truck charging hubs to enable electrification of medium and heavy-duty commercial vehicles.

I just want to start by thanking you for your work to date on this rule. I think this has been a good, transparent process with a lot of public input, and we appreciate it. I specifically want to support the heavy-duty FCI, or capacity credits. This is a really innovative and elegant way to support build-out of charging stations ahead of widespread truck development and kind of break this chicken-or-egg dilemma that that is kind of keeping us at a standstill here.

It's really great specifically to see that shared charging depots are eligible, and we Appreciate the 10-megawatt cap. I think that's a reasonable limit to set and a good way to ensure a diversity of sites.

And then one other quick comment, I think a longer crediting period would help send a stronger market signal. For what it's worth, California uses 10 years for both electricity and hydrogen and we think that will send a bit stronger signal and help ensure that we really get these chargers out there.

We're continuing to review details, and we'll probably follow up with written comments on some more details around the capacity credits, verification, and some of the broader program goals, but I just wanted to touch on some of these high-level items that came up in the presentation earlier.

I'll also say that Clean Fuel Standard is one of the most important tools the states have for supporting transportation electrification in particular. I know a lot of the discussion is around issues on the biofuel side, that are definitely complicated. I just want to note that this policy also helps with electrification. And what you're doing in terms of including a capacity credit provision for medium- and heavy-duty vehicles is a big step forward. So, thank you.