

DOCKETED

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**CEC-600-2025-033; 2025â€“2026 Investment Plan Update for the
Clean Transportation Program**

See the attached comments by the National Charging Access Coalition. Please note, we have requested a meeting to discuss the Investment Plan

Additional submitted attachment is included below.



October 31, 2025

Comments on the 2025–2026 Investment Plan Update for the Clean Transportation Program
Publication Number CEC-600-2025-033

Dear California Energy Commission Staff and Commissioners,

The mission of the National Charging Access Coalition (NCAC) is to accelerate ubiquitous, safe and reliable access to electrical power for charging all types of personal vehicles, at home and at work. We do this by working with states and municipalities across the nation to adopt Electric Vehicle (EV) policies, programs, and building energy codes and standards that enable affordable home, workplace and public EV charging. We focus in particular on EV charging codes for workplaces and multi-family and rental housing.

In support of and in alignment with NCAC's mission, we offer the following the following high-level comments on the California Energy Commission's 2025–2026 Investment Plan Update for the Clean Transportation Program:

- 1) We are in extremely strong support of the California Energy Commission (CEC) increasing electric vehicle (EV) charging infrastructure – and home-based charging, especially in low-income and disadvantaged areas and in multi-family and rental housing. In particular, thank you for prioritizing this in the Communities in Charge solicitation. Please continue this focus, especially on retrofitting older buildings and affordable housing, which aren't sufficiently covered by CALGreen. Within the Communities in Charge solicitation, we urge the CEC to prioritize direct-wiring of home-based charging infrastructure, including but not limited to Level 1 and low-power level 2 infrastructure to ensure that low-income customers are able to charge their EVs on lower-cost utility rates such as CARE¹ and FERA² for which they may qualify.

Recognizing that there are new technologies and business models utilizing direct wiring that the CEC may not be aware of, NCAC requests a meeting in the near future with CEC staff to discuss these benefits, new technologies/business models, and how they can qualify to participate in the Communities in Charge solicitation³. Please contact Michelle Pierce, evnirvanaca@gmail.com to schedule this meeting.

¹ CARE (California Alternate Rates for Energy)

² FERA (Family Electric Rate Assistance)

³ For example not all direct wiring solutions require OCPP.

- 2) We support the CEC's plans to expand workforce development and to focus on opportunities for low-income and disadvantaged communities along with increasing support for California's indigenous communities.
- 3) Regarding hydrogen and the upcoming budget constraints, our position is that mandated hydrogen expenditures should only be spent in the medium and preferably heavy duty vehicle markets, and NOT on light duty (LD) fuel cell vehicles. According to sales data, there have been just over 2,000 LD fuel cell vehicles sold/leased every year since 2013 for a total of less than 20,000 vehicles since 2012⁴. This compared to EVs, where there were over 4 million on the road in 2024⁵. Further, light duty hydrogen's one claimed advantage over EVs, that of faster refueling, has been eclipsed by BYD in China with their 1MW chargers capable of delivering over 200 miles in under 5 minutes⁶. In the United States, some Porsche EVs⁷ and Teslas⁸ are already charging at over 300kW. Given rapidly advancing charging technology, it is clear that CEC mandated hydrogen expenditures should only be spent in the medium and preferably heavy duty vehicle markets.
- 4) Finally, we request, given the CEC's technical expertise, that CEC staff participate in and comment on national technical issues regarding EVs. For example, in the upcoming National Electric Code, we consider ground fault circuit interrupter (GFCI) requirements along with line-of-sight emergency stop requirements to be regulatory overreach which will add significant cost, particularly to future multifamily EV charging infrastructure installations. Having CEC's expertise inform the national code would be a significant contribution.

In closing, the NCAC thanks the CEC for the work done to date and looks forward to meeting with CEC staff to discuss the benefits of direct wiring and the new associated technologies/ business models as well as working with the CEC to address the remaining issues described above.

Cordially,

The National Charging Access Coalition Leadership Team*:

Dennis Corelis, retired Deputy State Architect for the California Division of the State
Architect

⁴ https://h2fc.org/sites/default/files/resources_public_files/FCEV-Sales-Tracking.pdf

⁵ <https://www.experian.com/blogs/ask-experian/how-many-evs-are-in-us/>

⁶ <https://www.byd.com/mea/news-list/byd-unveils-super-e-platform-with-megawatt-flash-charging>

⁷ <https://newsroom.porsche.com/en/press-kits/taycan/Die-Reichweite-und-das-Laden.html#:~:text=Shorter%20charging%20times%20thanks%20to,more%20swiftly%20as%20a%20result.>

⁸ <https://www.tesla.com/support/charging/supercharger#:~:text=In%20North%20America%2C%20V4%20Superchargers%20can%20charge,to%20325%20kW%20only%20at%20V4%20Superchargers.>

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