

**DOCKETED**

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**Suzanne Caflisch Comment (CTP Advisory Committee Member)**

*Additional submitted attachment is included below.*

## 2025–2026 Investment Plan Update for the Clean Transportation Program

### Written Comment

Suzanne Caflisch – Advisory Committee Member

Senior Associate, Better World Group

November 6, 2025

Thank you for the opportunity share feedback on the 2025-2026 Investment Plan Update for the Clean Transportation Program. Please find my responses to questions below.

#### 1. How should the light-duty funding allocation be proportioned between residential/multifamily home charging?, public DCFC?, or other?

- I recommend that light-duty funding allocations prioritize multifamily home charging, particularly for renters. For many people living in these residences, charging is the biggest obstacle to EV adoption and directing funding toward this segment will help remove a persistent barrier.

#### 2. What other aspects should we consider during a tighter budget year?

- I encourage the CEC to allocate funds to support bus electrification for public transit fleets. Block grants could help these public agencies access funding more easily than competitive solicitations.
- I support an emphasis on Level 1 charging options, which can enable charging at a lower cost that can affordably meet overnight charging needs of EV drivers.

#### 3. Additional feedback?

- When it comes to funding hydrogen fueling infrastructure as required by AB 126, I support an emphasis on medium and heavy-duty applications. In the light-duty sector, battery-electric vehicles remain more fuel efficient and cost-effective than fuel cell vehicles.
- I understand the reasoning behind the proposed funding allocations across Light-Duty Vehicle (LDV) charging infrastructure versus Medium and Heavy Duty Vehicle (MDV/HDV) infrastructure. That said, I wish to stress the importance of continuing to

prioritize MDV/HDV investments, where the potential for air quality improvement and GHG reduction is greatest. I would particularly emphasize the need to maintain funding commitments to ensure bus electrification and zero-emission public transit fleets.

- I encourage prioritizing investments that directly benefit disadvantaged and low-income communities.
  - To fill persistent equity gaps, CEC should consider exceeding the 50% minimum investment threshold for disadvantaged and low-income communities stipulated by the Clean Transportation Program.
  - I am interested in learning more about the metrics mentioned in the Plan that go beyond geographic location to measure and assess community benefits, and encourage CEC to make these metrics transparent and accessible.
- I support the Plan's focus on workforce development and the proposal to scale up investments in coming fiscal years. I encourage staff to ensure that these workforce investment funds are coordinated efficiently to avoid duplicating programs and projects that currently exist.