

DOCKETED

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Coalition for Clean Air comments on Staff Draft Report, 2025-2026 Investment Plan Update for the Clean Transportation Program

November 7, 2025

Commissioner Nancy Skinner
California Energy Commission
1516 Ninth Street Sacramento, CA 95814
Docket #: 25-ALT-01

Re: Staff Draft Report, 2025-2026 Investment Plan Update for the Clean Transportation Program -- Support

Dear Commissioner Skinner,

The Coalition for Clean Air strongly supported the CTP's reauthorization through AB 126 (Reyes) in 2023, particularly its equity requirements. We appreciate the work that went into the 2025-2026 Investment Plan Update and the October 27 Advisory Committee meeting, and we offer these comments on the staff draft report.

In general, we see a critical need to fund infrastructure for zero-emission medium and heavy-duty vehicles like trucks and buses. Replacing diesel engines that inflict toxic exhaust on our communities with engines that generate no tailpipe pollution is an urgent priority, especially for our low-income communities of color. California's Black, Asian-American and Latino communities are burdened by much greater diesel particulate matter than are our White communities. CEC's investments in ZE infrastructure complement the regulatory structure established by CARB to clean up diesel pollution, and expediting that infrastructure deployment is vital to the success of the zero-emission transition.

Despite the overall need for investment in MDHD infrastructure, we understand staff's proposal to weight this year's plan toward filling light-duty infrastructure deployment gaps, given that CEC currently has \$120 million for MDHD infrastructure available in open solicitations, and then to boost the proportion going to MDHD in future years. We urge CEC to prioritize multifamily home charging, as well as public fast charging in locations less likely to be served by private investment, because these investments will help overcome barriers to EV adoption by Californians of modest means. As one of the leaders of the Charge Ahead California campaign, we advocate for a zero-emission transportation transition that leaves none of our residents behind. We urge CEC to continue to exceed the minimum percentages established by AB 126 for investments in and benefitting disadvantaged and low-income communities, and we commend you for your record of allocating 61% of previous funds to those priority

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Public fast charging is usually the most expensive method for the customer. For those who have on-site parking and do not have lengthy commutes, Level 1 charging is a low-cost

option that should be supported without burdensome restrictions; therefore, we appreciate the staff draft's proposal to open the Communities in Charge program to Level 1 projects (something that has been recommended by a number of Advisory Committee members). For those low-income residents without on-site parking, Level 2 or DC fast charging should be made available at costs comparable to those paid by inhabitants of single-family housing.

Fuel-cell electric vehicles may play an important role in medium and heavy-duty transportation, so we believe that public investment in hydrogen fuel should go toward stations that can supply trucks and buses. The market has not shown confidence in light-duty hydrogen; despite CEC's massive investment of over \$230 million, we have only 50 retail stations open (according to CEC's website). For these reasons, CEC should restrict its hydrogen-specific funding to medium and heavy-duty vehicle hydrogen infrastructure. The CTP should also assist in greening the hydrogen fuel supply by prioritizing projects that use electrolytic hydrogen, to achieve lower life-cycle emissions of greenhouse gases and air pollution.

In addition to the investments proposed by the draft staff report, CEC has a crucial regulatory role to play in cleaning up transportation, the biggest source of air and climate pollution in our state. We applaud the recent adoption of charger reliability and reporting standards, and we strongly urge the adoption of standards for replacement tire efficiency. Currently, almost all new cars are equipped with low rolling resistance tires that boost each new car's efficiency and reduce emissions. However, when California consumers go to purchase replacement tires for their cars, they are unaware that almost all replacement tires sold throughout the state are not low-rolling resistance tires. As a result, once they replace their car's tires, they are unknowingly spending more money on fuel, whether it be gasoline, electricity or hydrogen, and increasing the amount of pollution that is caused by their vehicle.

CEC should adopt its proposed Replacement Tire Efficiency Program, a first-in-the-nation tire fuel efficiency standard for passenger vehicle replacement tires sold in California that aligns with the tires sold with new cars, along with consumer outreach and education at the point of sale so California drivers can easily compare tire efficiency, safety, and other attributes.

I look forward to the adoption of the Investment Plan Update, and to continuing to collaborate on CEC investments and regulations.

Respectfully,

Bill Magavern
Policy Director