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Rivian Comments - CTP Investment Plan Update 2025 - 2026

Additional submitted attachment is included below.



November 7, 2025

Commissioner Skinner
California Energy Commission
Docket No. 25-ALT-01
715 P Street
Sacramento, California 95814

RE: Docket 25-ALT-01 - Comments on 2025–2026 Investment Plan Update for the Clean Transportation Program

Dear Commissioner Skinner and Staff,

Rivian appreciates the opportunity to comment on the *2025 - 2026 Investment Plan Update for the Clean Transportation Program* ("the Investment Plan"). The Investment Plan is a critical cornerstone of California's efforts to electrify transportation and therefore achieve the state's climate goals. Overall, we are supportive of the proposed funding allocations for FY 2025 - 2026, but encourage the Commission to consider some adjustments to both the proposed funding allocations for FY 2026 - 2028 as well as funding program design and requirements for light-duty charging infrastructure, which are laid out in detail below.

Keeping the World Adventurous Forever

Founded in 2009, Rivian is an independent U.S. company headquartered in Irvine, California, with all Rivian vehicles manufactured in the US. With over 14,000 employees across the globe, Rivian's focus is the design, development, manufacture, and distribution of electric, zero emissions vehicles, ranging from pickups and full-sized SUVs to commercial vans, to our recently announced R2 and R3 vehicles. It is Rivian's mission to *Keep the World Adventurous Forever* by displacing the highest polluting vehicles on the road today as well as ensuring those vehicles are powered reliability and with clean energy.

In addition to our vehicles, Rivian is also a manufacturer of direct current fast chargers (DCFC) and deploys, owns, and operates those chargers under a nationwide charging network – the Rivian Adventure Network. Since launching in 2022, the network has deployed over 800 DC fast charging ports nationwide at over 120 sites, with 85% of those sites now open to all EVs, with more coming soon. Rivian has also started transitioning portions of charging sites to the SAE J3400 NACS connector in anticipation of the

growing base of vehicles with native NACS charging inlets coming to market. Rivian's commitment to charging reliability has been demonstrated through the Rivian Adventure Network's high uptime rates of 97%+, achieved via our vertical integration and robust operations and maintenance support.

Investment Plan Feedback

The proposed Investment Plan reflects a forward-looking framework for allocating resources to meet the state's transportation electrification goals while also taking into account an evolving landscape. With this in mind we offer the following points of feedback for further consideration by the Commission and Staff as the Investment Plan is finalized:

- **Strongly support the realignment of prioritizing investment toward light-duty charging infrastructure for 2025 - 2026.** While the recent emphasis on medium- and heavy-duty ZEVs has been vital for a clean transportation economy, the widespread transition of light-duty vehicles hinges on a reliable, accessible, and equitable light-duty charging network. With more than one in five new light-duty vehicles sold in California now being a ZEV or plug-in hybrid¹, combined with a reduction in available federal tax incentives for charging in 2026, the proposed \$98.5 million allocation for light-duty charging is a critical and timely response that will accelerate consumer demand and fill infrastructure deployment gaps. This strategic realignment is indispensable for catalyzing the next phase of mass-market light-duty ZEV adoption and moving beyond early adopters.
- **Encourage an even allocation of funding between light-duty and medium/heavy duty charging infrastructure for FY 2026 - 2027 and FY 2027 - 2028.** For the reasons stated above, light-duty charging infrastructure will continue to be a critical piece of the puzzle to encourage overall transportation electrification looking past FY 2026. In addition, if "light-duty ZEV charging stations are made available to medium-duty ZEVs where practical", as proposed in the Investment Plan, light-duty infrastructure becomes an even more important contributor to encouraging overall electrification. Medium-duty pickups and vans, also known as Class 2b and 3 pickups and vans, are the workhorse of the broader medium- and heavy-duty segment and widely deployed by public and commercial fleets alike. Their charging needs and physical attributes more closely resemble the light-duty fleet than larger heavy-duty vehicles, allowing for the possibility that public infrastructure built for light-duty use could support medium-duty operations. It is important to note, however, that this opportunity should be clearly defined as applicable to medium-duty ZEVs only. Anything larger—Class 4 and above—usually

¹ Tuggy, Benjamin. 2025. *2025–2026 Investment Plan Update for the Clean Transportation Program*. California Energy Commission. Publication Number: CEC-600-2025-033-SD. pg.12

requires significant changes to charging station layout to enable a desirable customer experience. Finally, although there are other complementary funding sources for light-duty charging infrastructure (NEVI, LCFS, etc.) it is important to note that overall the sources are less reliable in terms of total funding available than the grants and rebates provided by the CEC through the Clean Transportation Program.² Reliability of funding continues to be the most important aspect of any funding opportunity in the current industry landscape. Therefore, we encourage the Commission to consider updating the proposals for FY 2026 - 2027 and FY 2027 - 2028 to establish a balanced funding allocation for charging infrastructure between light-duty/medium duty (Class 3 and below) and heavy duty (Class 4 and above).

As the Commission further considers the implementation specifics of funding for light/medium duty charging infrastructure, we would like to specifically highlight our support for the following:

- **Intentional investment in funding for light-duty L2 charging, specifically in multi-unit dwellings in urban areas.** In addition to a robust and reliable network of public DC fast chargers, access to Level 2 charging where current (and future) EV drivers live is critical to continuing the momentum of EV adoption state-wide. This is especially true in California, where almost half of all new housing units built between 2010 and 2023 have been classified as multi-unit.³ We therefore encourage the Commission to balance the need for continuing to invest in public DC fast charging infrastructure with targeted funding for Level 2 charging in multi-unit dwellings. While Level 1 charging can also provide important support, Level 2 provides a better driver experience overall, ultimately encouraging drivers to go electric (and *continue* driving electric).
- **Continue prioritizing investment in rebate programs for light-duty DC fast charging,** such as the CALeVIP program. The current CALeVIP program structure is a national model for charging infrastructure funding as it results in faster deployments of infrastructure compared to other funding structures. The program has played a key role in California's robust roll out of charging infrastructure as well as improving charging access across geographies. Therefore, a continued and

² The NEVI program continues to experience efforts to adjust program requirements and funding levels that could result in materially less charging infrastructure deployed than originally estimated. LCFS credits experience notable fluctuations in pricing resulting in uncertainty which ultimately impacts business investment decisions.

³ Multi-unit Housing Is Becoming More Common, but Has Low Homeownership Rates, Public Policy Institute of California. August 10, 2023.
<https://www.ppic.org/blog/multi-unit-housing-is-becoming-more-common-but-has-low-homeownership-rates/>

consistent funding flow to this program is critical to continue building on its success.

- **Allow for increasing percentages of chargers funded by the Clean Transportation Program to be deployed with SAE J3400 NACS connectors.** We applaud the Commission for their continued leadership on adapting to a rapidly innovating industry landscape by allowing up to 50% of deployed chargers at a site to have SAE J3400 NACS connectors under the CALeVIP program. As the industry continues to evolve on this front, we encourage the Commission to allow for larger percentages of SAE J3400 NACS connectors at sites funded by the Clean Transportation Program. Several automakers, including Rivian, are now actively selling vehicle models with native NACS charging inlets, with more to come based on automaker announcements. Given this momentum, several leading charging network providers, including ChargePoint, EVgo, EA, Ionna, and Rivian, are already transitioning their charging infrastructure to include NACS charging connectors. The transition to NACS for both vehicles and chargers is therefore already well underway, with even more momentum expected in 2026.
- **Continued funding support for strategic R&D opportunities.** As California's ZEV market matures, continued investment in innovative research and development is a strategic necessity - from developing new charging hardware to integrating that hardware seamlessly with the electric grid. To secure the long-term success of the clean transportation transition, technologies that make our energy ecosystem more efficient, resilient, and affordable must be proactively developed and deployed. We therefore encourage the Commission to continue its commitment via the Clean Transportation Program to support R&D funding either in the form of stand alone grants or by enabling R&D-related activities to be eligible expenses within broader grant opportunities.

Thank you again for the opportunity to comment on the Investment Plan. As currently proposed, it will provide critical support for California's transportation electrification goals during a pivotal time for the industry. We look forward to continuing to work with the Commission and Staff to further fine tune the Investment Plan and welcome any follow-up discussions on our comments above.

Sincerely,

Kelsey G. Johnson
Senior Lead Policy Advisor - Energy & Charging
Rivian