

**DOCKETED**

<b>Docket Number:</b>	25-ALT-01
<b>Project Title:</b>	2025–2026 Investment Plan Update for the Clean Transportation Program
<b>TN #:</b>	267086
<b>Document Title:</b>	Union of Concerned Scientists Comments - UCS Comments on 25-26 CTP IPU
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Union of Concerned Scientists
<b>Submitter Role:</b>	Other Interested Person
<b>Submission Date:</b>	11/7/2025 1:38:27 PM
<b>Docketed Date:</b>	11/7/2025

*Comment Received From: Union of Concerned Scientists  
Submitted On: 11/7/2025  
Docket Number: 25-ALT-01*

## **UCS Comments on 25-26 CTP IPU**

*Additional submitted attachment is included below.*

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California Energy Commission  
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RE: UCS Comments on *Staff Draft Report, 2025-2026 Investment Plan Update for the Clean Transportation Program* (Docket Unit, MS-4; Docket No. 25-ALT-01)

Commissioner Skinner and Clean Transportation Program Staff,

On behalf of the Union of Concerned Scientists (UCS), thank you for the opportunity to comment on the California Energy Commission's (CEC) draft 2025-2026 Investment Plan Update (IPU) for the Clean Transportation Program (CTP). We would like to recognize the significant amount of time and effort staff have invested in this program and report, as well as the open public engagement process around its creation.

California's work to electrify our transportation system is more important than ever, given the ongoing and escalating federal attacks on air quality policies, climate change mitigation, and transportation modernization.<sup>1</sup> This dereliction of science-based decision-making threatens public health, the planet, and our nation's global competitiveness. CEC's prerogative to strategically direct state investments in zero-emission fueling infrastructure is a foundational part of the much-needed work toward reducing public health and environmental impacts from our transportation system, as well as moving toward more energy- and cost-efficient means of transporting people and goods.

UCS supports CTP's continued prioritization of zero-emission vehicles (ZEVs), particularly the focus on battery-electric charging infrastructure, as well as the prioritization of funding directed toward zero-emission medium- and heavy-duty vehicle (MHDV) fueling at and near freight centers, such as ports and warehouses. Battery-electric technologies have the greatest potential to address climate change and air quality impacts from our transportation system in the near term.<sup>2</sup> Additionally, we see a focus on zero-emission drayage truck fueling infrastructure at freight hubs as a no-regrets strategy – one that delivers clear benefits regardless of future uncertainties. Electrifying drayage is key to addressing inequitable access to healthy air in historically marginalized communities and promoting energy-efficient and lower cost operations for California drayage fleets.<sup>3</sup>

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<sup>1</sup> Anair, Don. "Trump's Latest Move to Deny Climate Science and What It Means for Vehicle Standards." *The Equation*. Union of Concerned Scientists, August 5, 2025. <https://blog.ucs.org/don-anair/trumps-latest-move-to-deny-climate-science-and-what-it-means-for-vehicle-standards/>.

<sup>2</sup> Wilson, Sam. *Hydrogen-Powered Heavy-Duty Trucks*. Union of Concerned Scientists, November 21, 2023. <https://www.ucs.org/resources/hydrogen-powered-heavy-duty-trucks>.

<sup>3</sup> Wilson, Sam. "States Can Deliver a Cleaner Freight System Amid Federal Setbacks." *The Equation*. Union of Concerned Scientists, August 20, 2025. <https://blog.ucs.org/sam-wilson/states-can-deliver-a-cleaner-freight-system-amid-federal-setbacks/>.

As California continues to lead in the transition to zero-emission transportation, it is critical that CTP investments remain transparent, resilient, and responsive to stakeholder needs. To strengthen the effectiveness of the final IPU, we offer recommendations in three key areas: clarifying total and historical funding availability, identifying sustainable revenue strategies to address federal funding shortfalls, and enhancing stakeholder engagement to improve programmatic outcomes. These recommendations aim to support CEC in maintaining momentum toward state electrification goals.

### **Clarifying Total Funding Availability and Historical Investment Trends**

First, we would recommend that staff include additional figures in the report to clarify the total funding available during this Fiscal Year, such as a breakdown of the additional funding currently available for zero-emission MHDV fueling infrastructure. Although staff and leadership have taken multiple opportunities during public meetings to verbally clarify total funding in addition to the data presented in Table ES-1 and Table 6, a figure showing total available funding would clarify CTP's on-going and future allocations for stakeholders who did not attend related meetings. Additionally, because stakeholders often reference historic CTP IPUs as resources, clarifying total funding would also help to avoid any future confusion.

We would also suggest that staff include detailed funding data from previous years to provide a clearer picture of changes in total funding amounts from various sources, such as base CTP funds and Greenhouse Gas Reduction Fund revenue. Clear messaging around previous funding levels and sources will help to guide both agencies and stakeholders as California examines new opportunities to fund electrification initiatives.

The growth in California's ZEV market has been quite impressive, with significant and consistent increases in adoption among all vehicle types. Even so, the momentum behind the ZEV market, particularly for MHDVs, is vulnerable to the current federal policy changes and resulting headwinds. As such, we recommend that staff include a high-level overview of defunded federal infrastructure programs and revoked funding – whether directly and indirectly related to CTP's investment priorities. This would serve as a useful resource as state and local agencies, grant recipients, and stakeholders work to ensure that California continues to meet state electrification goals in the face of federal roadblocks.

### **Exploring Significant, Sustainable, and Durable Revenue Strategies for CTP**

We would suggest that staff examine significant and sustainable methods to expand funding, including new revenue sources and reallocating existing funds, for CEC's vital infrastructure programs as a part of annual IPUs. For example, it would be instructive for CEC to provide additional details on infrastructure funding ideas raised in the Joint Agencies' response to Executive Order N-27-25 on ZEV Deployment, such as leveraging the Trade Corridor Enhancement Program to support ZEV infrastructure needs.<sup>4</sup>

The rollback of key federal electrification investment programs and Inflation Reduction Act incentives for zero-emission fueling infrastructure compels states to take proactive steps to address these massive funding gaps. While we understand that CEC staff may be engaging with other state decision-making bodies on California's ZEV Forward initiative, CTP staff's deep expertise and existing spaces for expert and stakeholder feedback, such as the CTP Investment Plan Advisory Committee, suggests that future annual reports may be a good venue for continued examination of durable and meaningful funding opportunities for zero-emission fueling infrastructure.

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<sup>4</sup> California Air Resources Board, et al. "Report to the Governor in Response to Executive Order N-27-25 on Zero-Emission Vehicle Deployment." August 2025. [https://ww2.arb.ca.gov/sites/default/files/2025-08/August%202025%20Report%20to%20the%20Governor%20in%20Response%20to%20Executive%20Order%20on%20ZEV%20Deployment%20FINAL\\_0.pdf](https://ww2.arb.ca.gov/sites/default/files/2025-08/August%202025%20Report%20to%20the%20Governor%20in%20Response%20to%20Executive%20Order%20on%20ZEV%20Deployment%20FINAL_0.pdf).

## **Reviewing Stakeholder Engagement and Programmatic Effectiveness**

Finally, we recommend that staff consider including a section in the report detailing how CEC staff have promoted funding opportunities and engaged with ports, fleets, infrastructure companies, and other funding recipients to better understand opportunities for programmatic improvements. Changes in federal funding programs have led to increased workload and regulatory uncertainty for many of the CTP's constituency – from major public ports to small commercial fleets. Increased engagement on behalf of CTP staff may lead to more strategic investments, programmatic improvements, and a wider understanding among CTP stakeholders of available funding opportunities.

## **Concluding Thoughts**

UCS appreciates the opportunity to provide input on the draft 2025-2026 IPU. As California continues to lead the nation in advancing a sustainable transportation system, it is essential that CTP remains transparent, well-resourced, and responsive to the evolving needs and challenges of the ZEV market, shifting state and federal policies, and stakeholder priorities. By clarifying funding availability, exploring sustainable revenue strategies, and strengthening stakeholder engagement, CEC can better ensure that its investments deliver maximum public health, environmental, and economic benefits. We look forward to continued collaboration and thank the CEC for its dedication to building a cleaner, modern, and more efficient and equitable transportation future.

A handwritten signature in black ink, appearing to read "Sam Wilson". The signature is fluid and cursive, with the first name "Sam" and last name "Wilson" clearly distinguishable.

Sam Wilson  
Senior Analyst, Clean Transportation Program  
Union of Concerned Scientists