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*Comment Received From: Nick Chiappe
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California Trucking Association's Comments

Additional submitted attachment is included below.



California Trucking Association
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California Energy Commission
Chief Counsel's Office
715 P Street
Sacramento, CA 95814

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RE: 2025 – 2026 Investment Plan Update for the Clean Transportation Program

The California Trucking Association (CTA) is the nation's largest state association representing the trucking industry. Established in 1934, our 1,000+ members represent all segments of the industry, including both small and midsize companies as well as large international logistic providers.

CTA appreciates the opportunity to comment on the California Energy Commission's (CEC) 2025 – 2026 Investment Plan Update for the Clean Transportation Program (CTP).

CEC's CTP has been a critical resource for supporting the adoption of zero-emission heavy-duty battery electric vehicles (ZE HD BEVs) in the state of California. High costs of ZE HD BEVs present considerable challenges for adoption requiring considerable upfront capital expenditures for purchasing the newer, cleaner technology. ZE HD BEVs are fundamentally different than traditional diesel trucks, which present many limitations in their duty cycles, weight, and refueling efficiency. Adoption of HD BEV technology is an economic risk and a luxury, which may only be afforded by companies possessing sufficient financial flexibility and operational capacity to absorb higher upfront costs and potential operational disruptions associated with early technology adoption.

State incentives have played and continue to play an integral role in encouraging the growth and adoption of HD BEVs. In 2024, the average Clean Truck and Bus Incentives' (HVIP)

purchase order for a class 8 ZE truck totaled \$435,839¹. Programs like HVIP reduce high-cost barriers by bridging the gap through incentives. Recently, the HVIP program incentives were fully subscribed in one day, which will lead to potentially 1,028 new HD BEVs on California's roads. The 2025 HVIP subscription will almost double the total amount of class 8 BEVs on the road today with 1,337 BEVs in California as of the end of last year according to CEC's 2024 Medium- & Heavy-Duty ZEV Population.² Even in the absence of regulations, incentives have proven to result in the adoption of HD BEV technology.

These costs also do not factor in expenses related to electrifying facilities for construction and installation of HD BEV charging infrastructure necessary for refueling capabilities. The CTP is another critical resource for reducing barriers and access to newer, cleaner technology. Slowing down or cutting the allocation of resources to support the CTP could inadvertently hinder the historic investments the legislature has appropriated for clean truck incentives.

CTA appreciates CEC's commitment to supporting the adoption of HD BEVs and advancing the state's clean air goals. We hope the agency remains flexible should the existing unallocated funding be quickly oversubscribed as the industry increasingly adopts the technology. Thank you again for the opportunity to provide comment and if you have any questions, please contact me by email at nchiappe@caltrux.org.

Thank you,



Nick Chiappe
Director, Government & Regulatory Affairs
California Trucking Association

¹ https://ww2.arb.ca.gov/sites/default/files/2024-12/Zero%20Emission%20Class%208%20Tractor%20Pricing%20Comparisons_ADA.pdf

² <https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics-collection/medium>