

DOCKETED

Docket Number:	25-ALT-01
Project Title:	2025–2026 Investment Plan Update for the Clean Transportation Program
TN #:	267095
Document Title:	GRID Alternatives Comments - Comments on the 2025-2026 Investment Plan Update for the Clean Transportation Program
Description:	N/A
Filer:	System
Organization:	GRID Alternatives
Submitter Role:	Public
Submission Date:	11/7/2025 3:51:05 PM
Docketed Date:	11/7/2025

*Comment Received From: GRID Alternatives
Submitted On: 11/7/2025
Docket Number: 25-ALT-01*

Comments on the 2025-2026 Investment Plan Update for the Clean Transportation Program

Additional submitted attachment is included below.



November 7, 2025

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

VIA DOCKET
Energy Commission Docket 25-ALT-01

Re: Comments on the 2025-2026 Investment Plan Update for the Clean Transportation Program

Dear Commissioner Skinner and Energy Commission Staff:

GRID Alternatives ("GRID") is the country's largest nonprofit that builds community-powered solutions to advance economic and environmental justice through renewable energy. Since 2004, we've installed clean energy technologies for over 30,000 income-qualified households across the country. Over the last eight years, we have paired our longstanding work on solar PV with increased access to electric vehicles, EV charging stations and battery storage deployment for income-qualified families, multifamily housing owners and community facilities in economic and environmental justice communities.

GRID strongly supports the CEC's continued efforts to increase equitable access to EV charging infrastructure. Specifically, we are in strong support for investments that prioritize low-income renters living in multifamily homes, with a particular focus on those living in disadvantaged communities. California has a very high percentage of renters who face greater challenges accessing overnight EV charging at home, but have the greatest need for the low cost and high convenience that home charging provides. Roughly 45 percent of California residents are renters, many of whom live in multifamily housing.¹ In California, renters are more likely to be lower income than homeowners,² making it critical to focus investments not only *in* disadvantaged communities, but investments specifically *for* the low income tenants who live there. A project sited in a CalEnviroScreen DAC does not by itself indicate the investment is for the benefit of low-income community members within the community - many of these investments largely benefit higher-income EV drivers passing through the community. Safeguards are necessary within CEC investment program design and policy to prevent this occurrence.

¹ [Snapshot of Tenants in California, 2022. Tenants Together.](#)

² [California's Housing Affordability Crisis Hits Renters and Households with the Lowest Incomes the Hardest, 2019. California Budget & Policy Center](#)

Maximum priority for public funding during a tight budget year should be given to sectors that are getting the least amount of funding from the private sector. This means maximizing funding for multifamily residential home charging. Funding for the CEC's REACH program in particular should be prioritized, since REACH is uniquely able to serve multifamily housing sites that are not able to adopt charging without state support. As a grant program that enables "direct install" services, REACH serves multifamily property owners who have minimal capacity to initiate charging projects themselves and cannot co-fund the costs of charging, which is particularly critical for affordable housing owners who are already struggling to pay for baseline operating expenses.

GRID Alternatives also supports the new project concept that Commissioner Skinner shared at the Advisory Council meeting on October 27th, which represents an overdue investment towards the state's SB 350 Barriers Studies where the CEC³ and CARB⁴ partnered with stakeholders throughout California to examine barriers that low-income and disadvantaged communities face when considering adopting clean energy and clean transportation measures. GRID recommends an "end-to-end" supportive approach for the transition to EVs, with culturally-appropriate outreach and education for low-income clients seeking to switch to zero-emission vehicles; direct installation of customized charging solutions for renters; and place-based partnerships. This approach has been proven to be successful in other equity programs in California, such as the Strategic Growth Council's Transformative Climate Communities program, and GRID is excited to see it being applied to community charging infrastructure.

While we strongly believe the state's investments for light-duty charging should center multifamily charging infrastructure, any investments in DCFC can and should be coupled with programs to make public charging for low-income households more affordable. GRID has been developing and implementing affordable public charging programs since 2019, when we worked with CARB to develop, approve and launch the state's first subsidized public charging offering for low-income drivers through the state's Financing Assistance for Lower-Income Consumers EV equity program. GRID has now expanded this work nationally, in partnership with the national electric utility sector to pilot scalable models to bring existing utility low-income discount programs to public chargers.⁵

Finally, let's not have another year pass without raising the bar for equity goals. While AB 126 set a baseline of 50 percent benefit to DACs and low-income communities, we know now from several years of investment that many projects that are sited in these communities do not necessarily always provide benefits for the low-income folks who live in them. We have identified charging station projects sited for travelers passing through a DAC, or for property owners that build in DACs but rent at market-rate. We need to move beyond checking the box and strengthen project criteria to better ensure targeted benefits. Prioritizing residential charging for low-income folks is a straightforward strategy to meet this goal. It's not too late to establish metrics for tracking benefits to increase equity and inclusion within this new CTP.

³ [SB 350 Low-Income Barriers Study, Part A](#)

⁴ [Low-Income Barriers Study, Part B: Overcoming Barriers to Clean Transportation Access for Low-Income Residents](#)

⁵ [Affordable Public Charging. GRID Alternatives](#)

We look forward to continuing to support the Commission and its staff in your efforts to increase equitable transportation electrification.

Sincerely,

Linda Khamoushian
Senior Clean Mobility Strategist