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CALSTART Comments on Clean Transportation Program Investment Plan 2025 - 2026

Additional submitted attachment is included below.

CALSTART, Inc.

48 S. Chester Avenue
Pasadena, CA 91106
(626) 744 – 5600
www.calstart.org

November 7, 2025

To: California Energy Commission

RE: Clean Transportation Program Investment Plan 2025 - 2026

CALSTART, headquartered in California, is a globally renowned organization dedicated to the advancement of zero emission vehicle (ZEV) and infrastructure technology. CALSTART is the administrator for block grant incentives on behalf of the California Energy Commission, including Energy Infrastructure Incentives for Zero-Emission Commercial Vehicles (EnergIIZE), Communities in Charge, and Zero Emission School Bus Infrastructure (ZESBI).

We would like to offer the following recommendations in response to the 2025 – 2026 Clean Transportation Program Investment Plan.

Expand LD Focus of L2 Charging to Workplace, Fleets, and Tribes

CALSTART sees workplace charging as a great use case for Level 2 charging, and studies often site workplace charging as a great second location to at-home charging to drive ZEV adoption. Communities in Charge saw significant demand for workplace charging in past funding waves. The Communities in Charge program has elevated Workplaces in Charge as a Community Connection, eligible for additional points in rubric score, where workplace charging is being installed at small businesses and in industry sectors where employment has a higher concentration of lower income employees.

Additional use cases that CALSTART recommends for consideration for Level 2 EVSE are light duty fleets and tribes. Light duty fleets with duty cycles conducive to slower charging rates can benefit from depot charging that can be more predictable and cost-effective than enroute opportunity charging at public stations.

In past Communities in Charge funding waves, the program experienced a significant uptick in demand from tribal applicants, illustrating a need for charging infrastructure in their communities.

CALSTART recommends the CEC consider workplace charging, light duty fleet charging, and tribes as additional use cases for Level 2 charging that can offer affordable and reliable charging alternatives for those unable to charge at home and where public charging may not meet their charging needs.

Encourage Sustained, Consistent Investment in MHD ZEV Infrastructure

CALSTART applauds the significant investment the CEC has committed to medium- and heavy-duty (MHD) ZEV infrastructure. The EnergIIZE project has experienced significant demand across EV charging and hydrogen refueling projects, particularly a demand for depot infrastructure providing reliable, affordable charging/fueling. Additionally, with the standardization of the Megawatt Charging System (MCS) innovative technology, there is potential for demand for MCS charging within the newly launched EnergIIZE MCS Pilot funding lane for public, private, or shared MCS projects serving drayage operations. CALSTART continues to see a need for sustained and consistent investment exceeding CEC's proposed allocations.

Infrastructure remains a significant obstacle for fleets seeking to transition to ZEVs and a key consideration in their transition planning. Public charging sites that accommodate MHD ZEVs are few and are not always configured with the ingress/egress pathways, connector/nozzle placement, and amenities that MHD fleets need.

CALSTART's research on Phasing in US Charging Infrastructure shows prioritizing hubs in the first phase of development:

> "Hubs will be depot-style home bases in industry clusters for out-and-back operations. As buildout occurs, many of these hubs can also form by two or more firms entering into agreements to share infrastructure, or where infrastructure providers at key locations provide a multiuse site. Demand for energy at these sites can be concentrated in a predictable manner which utilities can target, and fleets can utilize charge management systems to keep growth underneath capacity during buildout.[1]"

Hydrogen is likely to continue to see growth in the transit industry. EnergIIZE has consistently seen strong demand for hydrogen refueling stations across its funding waves where hydrogen was eligible. Within the transit industry, there are counties utilizing battery electric and hydrogen fuel cell buses showing demand for ZEB infrastructure. We

[1] https://calstart.org/zev-infrastructure-phase-in/

see consistent and growing demand for fuel cell buses among transit agencies nationally and in California. In California, between 2023 and 2024, fuel cell electric buses saw a growth of 55%, with demand coming from public transit agencies, small fleets, airports, and others[2] for full size and small fuel cell electric buses.

CALSTART administers CARB's Clean Truck and Bus Voucher Incentive Project (HVIP) for hydrogen buses and tractors. 427 vouchers were applied for in 2024 and California Air Resources Board (CARB) data shows 124 FCEBs active as of November 24 across 7 counties. As of October 2025, 470 vouchers have been applied for across 15 counties between Humboldt and San Diego.[3]

CALSTART recommends sustained levels of investment in MHD ZEV infrastructure, including continued support to private, shared, and public ZEV charging and hydrogen refueling locations.

Emphasizing Importance of Workforce Development

CALSTART is encouraged by the Commission's continued focus on Workforce Development, especially to support EVITP programs and maintenance. CALSTART has seen consistent alignment with EV project demand and concentrations of EVITP certified technicians[4]. Where there are fewer technicians, project sites encounter higher costs, longer timelines, and fewer options in contractor selection. Having enough qualified maintenance and repair technicians is also critical to charger reliability and up time throughout the state.

Workforce Development support to fleets and fleet facility managers is important for on-site charging and refueling infrastructure, including through planning, installation, maintenance, and operations.

CALSTART encourages the Commission to consider further collaboration with other regulatory agencies, such as the Department of Industrial Relations and Division of Measurement Standards to ensure that ZEV infrastructure installers and operators are familiar with the most up to date regulatory requirements. The CEC has collaborated with these organizations in the past, and those workshops were very helpful.

CALSTART would like to emphasize the importance of Workforce Development for the planning, installation, operations, and maintenance of EV charging and hydrogen refueling stations.

[2] https://calstart.org/zio-zebs/
[3] https://californiahvip.org/impact/#deployed-vehicle-mapping-tool
[4] https://evitp.org/california

Conclusion

We respectfully request that you consider the above recommendations to strengthen California's zero-emission vehicle infrastructure, which is essential to advancing the state's transition to clean transportation and meeting its climate commitments.

Thank you for your time and attention.

Sincerely,

Darryl Little Jr.
State Policy Director
CALSTART, Inc.