

DOCKETED

Docket Number:	26-ALT-01
Project Title:	2026-2027 Investment Plan Update for the Clean Transportation Program
TN #:	270175
Document Title:	Powering America's Commercial Transportation Comments - PACT Comments on 26-ALT-01
Description:	N/A
Filer:	System
Organization:	Powering America's Commercial Transportation
Submitter Role:	Public
Submission Date:	5/22/2026 1:53:49 PM
Docketed Date:	5/22/2026

*Comment Received From: Powering America's Commercial Transportation
Submitted On: 5/22/2026
Docket Number: 26-ALT-01*

PACT Comments on 26-ALT-01

Please see the attached document for the comments of Powering America's Commercial Transportation (PACT) regarding 26-ALT-01

Additional submitted attachment is included below.



May 22, 2026

Commissioner Nancy Skinner
Presiding Member of the Clean Transportation Program Advisory Committee, California Energy Commission

Drew Bohan
Executive Director, California Energy Commission

Spencer Reeder
Director, Fuels and Transportation Division, California Energy Commission

Melanie Vail
Deputy Director, Fuels and Transportation Division, California Energy Commission

RE: Prioritize Medium- and Heavy-Duty Zero-Emission Vehicle Charging Infrastructure in the 2026-2027 Investment Plan Update for the Clean Transportation Program

Dear Commissioner Skinner and Energy Commission Staff:

Powering America's Commercial Transportation (PACT) and its members write to express our support for the Energy Commission's (CEC) plan to continue making importantly needed investments into medium- and heavy-duty (MHD) zero emission vehicle (ZEV) infrastructure. Given the State's proposed reductions to Greenhouse Gas Reduction Fund (GGRF) support for ZEV infrastructure, we also respectfully urge the CEC to increase planned Clean Transportation Program (CTP) investments in MHD ZEV infrastructure to the greatest extent feasible.

Continued CTP investment in MHD ZEV infrastructure is especially important at this time: federal programs that support investments in EV charging infrastructure will expire on September 30, and the state's proposed budget includes a plan to eliminate \$785 million in CEC ZEV infrastructure investments from GGRF. Despite these headwinds, however, demand for CEC ZEV infrastructure remains strong:

- CALSTART has reported that the EnergiIZE Program's Fast Track funding lane has "...a reputation for reaching subscription capacity in minutes"; and,¹

¹ CALSTART. (2025). Spring Into Action for a Chance to Secure Up to \$5M...New Funding Lanes to Open in May. CALSTART. <https://calstart.org/california-energy-project-announces-three-new-spring-funding-lanes-for-mhd-truck-infrastructure/>



- CEC solicitations for MHD ZEV infrastructure often receive significantly higher demand than funding allows, e.g., GFO-24-602 (CRITICAL PATHS 2.0) received applications totaling over \$102 million in requested funding but could only award \$40 million.²

Likewise, demand for ZEVs has also remained strong:

- The Clean Truck and Bus Voucher Incentive Project's (HVIP) funds were nearly exhausted in one week after opening in September 2025
- The Clean Off-Road Equipment Voucher Incentive Project (CORE) reopened in August 2025 with \$36M available and received \$80M in requests within five days; and,³
- The California Air Resources Board (CARB) just launched the California Clean Fuel Rewards Program, making \$1 billion in rebates for electric trucks available through 2030.⁴

At the same time, market stakeholders are ramping up the implementation of measures to improve conditions for faster, lower cost, and more reliable ZEV infrastructure deployment. Via Rulemaking R.24-01-018, the California Public Utility Commission (CPUC) has ordered utilities to reduce energization timelines so chargers can come online faster, and via R.24-06-017, the CPUC has ordered utilities to improve distribution planning for electrification-driven load growth by incorporating bottom-up load data into forecasts, thereby helping utilities and developers plan ahead more effectively.

Taken together, the market demand for MHD ZEVs, continued implementation of measures designed to simplify and streamline deployment, continued State investment into vehicle incentive programs, and proposed cuts to state investment in ZEV infrastructure via GGRF reallocations indicate a coming infrastructure funding gap which the CEC can help fill. For this reason, we support the CEC's plan to continue CTP investments in MHD ZEV infrastructure, and we ask that the CEC prioritize increases to its MHD ZEV infrastructure allocations to help close this gap.

Thank you for your leadership and consideration.

Sincerely,

David Bonelli
Partner, Venable LLP
Counsel to Powering America's Commercial Transportation

² California Energy Commission. (2025, March 28). GFO-24-602. California Energy Commission. <https://www.energy.ca.gov/solicitations/2024-10/gfo-24-602-charging-and-refueling-infrastructure-transport-california>

³ California Air Resources Board, "Drive Forward Incentives Public Workshop", November 13, 2025, <https://ww2.arb.ca.gov/sites/default/files/2025-11/Drive%20Forward%20Incentives%20Workshop%20Nov%202025.pdf>

⁴ California Air Resources Board. (2026, May 13). California launching \$1 billion rebate program for electric trucks. California Air Resources Board. <https://ww2.arb.ca.gov/news/california-launching-1-billion-rebate-program-electric-trucks>