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CALSTART Comments on Clean Transportation Program Investment Plan 2026 - 2027

Additional submitted attachment is included below.

May 15, 2026

To: California Energy Commission

RE: *Clean Transportation Program Investment Plan 2026 - 2027*

CALSTART, headquartered in California, is a global 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).

CALSTART continues to support the Commission's allocation and investment in light-, medium-, heavy-duty ZEV infrastructure and workforce development. We would like to offer the following recommendations in response to the 2026 – 2027 Clean Transportation Program Investment Plan.

Enhance Light-Duty EVSE Affordability Through Studying Curbside Charging Options and Improve Resiliency through Integrated Battery Storage

CALSTART supports the Commission's focus on multifamily housing and public charging as important areas of investment for the state to increase access to EV charging for light duty vehicles.

To support the growing number of EV owners that do not have access to private charging, such as those who park on the street, we encourage the Commission to evaluate long-dwell curbside charging programs and approaches to standardized permitting for these options. This provides lower cost charging versus using more expensive fast chargers. This should include "bring your own cord" models that can reduce the cost of hardware and also reduce maintenance from broken or stolen cables. These chargers have been deployed in Los Angeles, New York City, and across Europe.

To maximize the effectiveness of light-duty (LD) charging deployments and address common electrical infrastructure barriers, CALSTART recommends that the CEC explicitly allow funding support for co-located on-site battery energy storage systems (BESS) as an eligible component of LD EVSE projects.

Many promising sites – especially older multi-family buildings with high vehicle concentrations – face electrical panel capacity constraints that limit the scale of charging infrastructure, result in costly and time-consuming utility upgrades, or lead to project delays and abandonments[1]. On-site BESS enables batteries to charge during off-peak or overnight periods (or from paired solar generation) and

[1] Many promising sites – especially older multi-family buildings with high vehicle concentrations – face electrical panel capacity constraints that limit the scale of charging infrastructure, result in costly and time-consuming utility upgrades, or lead to project delays and abandonments. NREL analysis shows that appropriately sized battery-buffered systems can reduce power grid service capacity needs by approximately 50% to 80% while enabling charging during outages. See Battery Energy Storage for Electric Vehicle Charging Stations help sheet: https://driveelectric.gov/files/battery-buffered-help-sheet.pdf

discharge to support daytime EV charging loads, allowing significantly larger L2 deployments without exceeding existing panel or service limits. This approach not only accelerates ZEV adoption by providing reliable, affordable, and predictable charging alternatives for those unable to charge at home but also creates substantial long-term value by positioning these sites as future community resilience hubs. When paired with solar PV and smart controls, the integrated systems can deliver backup power for critical loads and continued EV charging during grid outages, enhancing public safety and equity in vulnerable communities[2][3].

CALSTART recommends the CEC consider enhanced support for light duty opportunities by supporting integrated battery storage where beneficial – to offer affordable, reliable, and resilient charging options that improve load management flexibility and accelerate energization timelines.

Support Large Scale Managed Charging to Put Downward Pressure on Electricity Prices for All Consumers

Many studies have consistently shown that transportation electrification has the largest opportunity to put downward pressure on electricity prices through managed charging that can reduce peak loads. There have been many demo and pilot programs across the country and now is the time to scale these to provide benefits. Any program should be seamless to consumers, not require added cost and hardware, and work across any utilities wherever your vehicle is in the State. We encourage the Commission to work with automakers, utilities and third parties to develop this type of scalable approach. It will also be important to coordinate it with national partners.

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 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 recently oversubscribed 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.

Given the MCS chargers are expected to be the predominate charging type on HDVs in the very near future, it is important to future proof investments in charging now. We encourage the Commission to allow MCS chargers in any HDV charging program and encourage their deployment.

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[2] When paired with solar PV and smart controls, the integrated systems can deliver backup power for critical loads and continued EV charging during grid outages, enhancing public safety and equity in vulnerable communities. Clean Coalition Community Microgrid Initiative, including the Valencia Gardens Energy Storage Project (low-income/senior multi-family housing in San Francisco with solar and storage for resilience and grid support): https://clean-coalition.org/community-microgrids/valencia-gardens-energy-storage-project/ and https://clean-coalition.org/community-microgrid-initiative/

[3] Tesla Powerwall systems integrate with EV chargers to manage limited panel capacity, optimize charging, and provide backup power during outages: https://www.tesla.com/powerwall

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."[4]

CALSTART's Zeroing in on Zero Emission Trucks (ZIOZET) report released January 2026 shows a significant increase in zero emission truck deployments and planned deployments, with a year over year increase in California of 69% to 10,659 medium- and heavy-duty trucks[5].

Hydrogen is likely to continue to see growth in the transit industry. EnergIIZE has consistently seen strong demand for hydrogen refueling stations for transit buses where hydrogen was eligible. We see consistent and growing demand for fuel cell buses among transit agencies nationally and in California. In California, between 2024 and 2025, fuel cell electric buses saw a growth of 59% to 690 buses, with demand coming from public transit agencies, small fleets, airports, and others for full size and small fuel cell electric buses.[6]

CALSTART recommends sustained levels of investment in MHD ZEV infrastructure, including continued support to private, shared, and public ZEV charging locations. Continued coordination with utilities and support for early site energization planning will also be critical to ensuring infrastructure deployment timelines align with fleet transition needs.

Emphasizing Importance of Workforce Development and Extending Ability to Reimburse Workforce Development Costs

We support the Commission's commitment to collaborating with entities that have expertise in Workforce Development and are encouraged by the Commission's continued focus on Workforce Development, especially to support EVITP programs and maintenance. The deployment of ZEV infrastructure represents a significant opportunity to create jobs and encourage economic development in California. However, failure to build a robust workforce can also create a bottleneck that hinders the development of ZEV infrastructure. As a result, sufficient investment in workforce development (WFD) is of utmost importance.

The transition to ZEVs is expected to create a substantial number of jobs in the state of California. According to the 2022 Workforce Impacts of Achieving Carbon-Neutral Transportation in California

[4] https://calstart.org/zev-infrastructure-phase-in/
[5] https://calstart.org/zio-zets/
[6] https://calstart.org/zio-zebs/

study from the UCLA Luskin Center for Innovation, EV charging infrastructure construction is expected to create nearly 209,000 full-time equivalent (FTE) jobs by 2045. Many of these jobs are expected to be in construction-related industries.

CALSTART has seen consistent alignment with EV project demand and concentrations of EVITP certified technicians[7]. 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.

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

One avenue for achieving this objective that would be of great value to fleets is to make WFD costs reimbursable in CEC grants. The Federal Transit Administration has similar provisions in their Low or No Emission Grant Program (which funds the deployment of transit buses) that allow a portion of grant funding to be used on WFD. However, some CEC funding opportunities lack equivalent provisions. Recent CEC grant funding opportunities allow for spending on WFD to count as match share but not as a reimbursable expense. Allowing WFD spending to be a reimbursable expense would help to fund WFD initiatives and ensure that there is a sufficient labor force to build ZEV infrastructure.

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 with helpful workshops.

CALSTART would like to emphasize the importance of Workforce Development for the planning, installation, operations, and maintenance of EV charging and hydrogen refueling stations and recommend extending reimbursement of workforce development costs into more CEC opportunities.

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.

[7] https://evitp.org/california