

DOCKETED

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GRID Alternatives Comments_26-27 Draft Investment Plan Update

Additional submitted attachment is included below.



May 22, 2026

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

VIA DOCKET

Energy Commission Docket 26-ALT-01

Re: Comments on the Draft Staff Report, 2026-2027 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; and through our program administration work, our household impact extends to over 65,000 more. Over the last nine years, we have worked to pair 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. We appreciate the opportunity to comment on the Draft 2026-2027 Investment Plan Update for the Clean Transportation Program.

GRID strongly supports the CEC’s continued efforts to increase access to light-duty vehicle 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 more affordable overnight EV charging at home. Low-income renters especially have the greatest need for the low-cost and high convenience that home charging provides. Funding for the CEC’s Communities in Charge and REACH programs help achieve this crucial deployment. In particular, REACH enables “direct install” services for 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 appreciates the Commission’s efforts to expand access to home charging with the addition of Level 1 charger eligibility, in the multifamily home charging efforts, and would like to see the expansion and viability of that offering.

GRID Alternatives also supports the EV HOME pilot program announced in the Advisory Committee meeting on May 8th, which represents an overdue investment towards the state's SB 350 Barriers Studies where the CEC¹ and CARB² partnered with stakeholders throughout California to examine barriers that low-income and disadvantaged communities face when considering adopting clean energy and clean transportation measures. We appreciate the CEC's incorporation of our previous recommendations to design the pilot program to ensure 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 vehicle 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.³

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

¹ [SB 350 Low-Income Barriers Study, Part A](#)

² [Low-Income Barriers Study, Part B: Overcoming Barriers to Clean Transportation Access for Low-Income Residents](#)

³ [Affordable Public Charging, GRID Alternatives](#)