

DOCKETED	
Docket Number:	23-SB-02
Project Title:	SB X1-2 Implementation
TN #:	270438
Document Title:	Electrify America Comments on Draft Transportation Fuels Transition Plan
Description:	N/A
Filer:	System
Organization:	Michael Daft
Submitter Role:	Public
Submission Date:	6/9/2026 3:31:54 PM
Docketed Date:	6/9/2026

*Comment Received From: Michael Daft
Submitted On: 6/9/2026
Docket Number: 23-SB-02*

Electrify America Comments on Draft Transportation Fuels Transition Plan

Please see comments below from Electrify America.

Additional submitted attachment is included below.



June 9, 2026

Jonathan Bluffer
California Energy Commission
715 P Street
Sacramento, California 95814

RE: Electrify America Comments on the Draft TFTP and Docket #23-SB-02

Dear Jonathan Bluffer,

Electrify America appreciates the opportunity to comment on the Draft California Transportation Fuels Transition Plan (TFTP or Plan) and commends the California Energy Commission (CEC) and the California Air Resources Board (CARB) for their thoughtful, long-term approach to managing the state's transition to alternative clean fuels. The Plan reflects a clear-eyed understanding of the challenges and opportunities ahead, and we are encouraged to see the role that charging infrastructure will play in that vision.

Electrify America is one of the largest DC fast charging networks in the U.S., investing more than \$2 billion in Zero-Emission Vehicle (ZEV) infrastructure and access nationwide, and over \$800 million in California. This investment enables millions of ZEV drivers to charge with confidence and discover the benefits of electric driving on our coast-to-coast network of highway and community chargers. As a network operator and a long-time participant in the state's clean transportation programs, we support the Plan's vision of a well-managed transition that keeps clean transportation reliable, affordable, and accessible to all Californians. With over half of our California investment to date directed into low-income and disadvantaged communities, we have seen firsthand how sustained public investment and supportive policy can expand access in the communities that need it most and reinforce the market confidence that sustains this transition.

The Mid-Transition Demands Sustained Support for the Charging Network

As the Plan notes, demand for fossil-based fuels, while declining, remains substantial, even as zero-emission technologies and low-carbon options continue to grow, and the state must support both systems at once to provide stable supply through the transition. This dynamic is playing out in real time, including in the ongoing Cap-and-Invest discussions, and it underscores a point central to Electrify America's work: the build-out of reliable charging infrastructure is not a future concern but a present-day imperative. The pace of the transition will depend in large part on whether drivers, particularly those without access to home charging, have confidence that a reliable, accessible network will be there when they need it. Sustained policy and funding support during this mid-transition window is essential to keep ZEV adoption on the trajectory the Plan envisions. We recognize the difficulty of managing these competing demands and appreciate Staff's careful work in framing the path forward.

Charger Reliability, Access, and Plug & Charge

Electrify America strongly supports the Plan's emphasis on increasing EV charger reliability and access, specifically including accelerating Plug & Charge implementation and expanding charging access in disadvantaged and low-income communities. Reliability is foundational to driver confidence, and that confidence is what moves more Californians to make the switch to cleaner vehicles. These priorities align closely with our own.

On Plug & Charge in particular, Electrify America has been an industry leader, having been among the first companies in the United States to deploy this technology and the first to utilize it with DCFC - offering it to drivers across numerous major automotive brands. We share the state's goal of accelerating a seamless Plug & Charge experience. Based on that experience, we encourage the CEC to pursue acceleration through flexible, industry-led adoption that builds on the momentum already underway in the market. The most effective role for the state is to support and reinforce that progress in a way that preserves flexibility, avoids stranding existing vehicles and infrastructure, and keeps the focus on improving the real-world driver experience. We welcome the opportunity to continue working with Staff as these efforts develop.

Reliable and Consistent Funding for ZEV Deployment

Electrify America strongly supports the Plan's call for reliable and consistent funding for the state's ZEV deployment and charging infrastructure incentive programs to expand markets and increase access for all drivers. In our experience, the start-stop nature of grant funding is one of the most significant barriers to scaling infrastructure efficiently. Predictable and sustained funding allows operators to plan against State investment, scale alongside it, and in turn reduce per-dollar administrative overhead.

As resources tighten, we encourage the CEC to direct funding toward programs with a proven track record of strong subscription, deployment, and equity outcomes, and to schedule funding rounds predictably. Concentrating limited dollars where impact is demonstrated, especially in the underserved and rural communities the Plan prioritizes, helps ensure those dollars translate directly into chargers going into the ground in a timely manner.

Conclusion

Electrify America commends the CEC and CARB for a thoughtful Plan that balances near-term needs with the State's longer-term climate and air quality goals. We look forward to continuing to work with Staff as this Plan and its associated strategies move forward, and we thank you for the opportunity to comment.

Sincerely,



Michael Daft

Gov't Affairs & Public Policy Lead – State Government
Electrify America, LLC