

DOCKETED

Docket Number:	26-ALT-01
Project Title:	2026-2027 Investment Plan Update for the Clean Transportation Program
TN #:	271251
Document Title:	Marissa Wu Comments - Marissa Wu - Greenlining - Comments on Updated 26-27 CTP Draft
Description:	N/A
Filer:	System
Organization:	Marissa Wu
Submitter Role:	Public
Submission Date:	7/2/2026 1:41:45 PM
Docketed Date:	7/2/2026

Comment Received From: Marissa Wu
Submitted On: 7/2/2026
Docket Number: 26-ALT-01

Marissa Wu - Greenlining - Comments on Updated 26-27 CTP Draft

Additional submitted attachment is included below.

July 2, 2026

California Energy Commission

715 P Street

Sacramento, CA 95814

Submitted electronically

Re: Docket 26-ALT-01 (2026-2027 Investment Plan Update for the Clean Transportation Program)

Introduction and Summary of Recommendations

The Greenlining Institute (“Greenlining”), works toward a future where communities of color can build wealth, live in healthy places filled with economic opportunity, and are ready to meet the challenges posed by climate change. We greatly appreciate the opportunity to submit comments to the California Energy Commission (CEC) to guide the development of the 2026-2027 investment plan (“CTP”, or Clean Transportation Program).

In alignment with our comments¹ on this year’s earlier plan update, we make the following recommendations, as summarized:

1. Prioritize funds for disadvantaged communities to address persistent equity gaps in electrification across California.
2. Continue to prioritize and coordinate investments for charging for multi-family housing, especially affordable housing.
3. Prioritize investments in charging infrastructure for medium- and heavy-duty (MDHD) ZEVs.
4. Consider supporting training fees as part of workforce development investments.
5. Limit hydrogen investments to medium- and heavy-duty infrastructure and implement an equity-centered definition of green hydrogen.
6. Revisit alternative funding options from the AB 126 report.

Below, please see elaborations on these recommendations:

Address Persistent Equity Gaps for Disadvantaged Communities

Increasing equity in California’s clean transportation transition remains a top priority, especially as the war on Iran continues impacting the oil market², compounding affordability concerns.

¹ Mars Wu Comments - Greenlining Comments on 26-27 Clean Transportation Program (<https://efiling.energy.ca.gov/GetDocument.aspx?tn=270164&DocumentContentId=107327>)

² IEA (2026), Oil Market Report - June 2026, IEA, Paris (<https://www.iea.org/reports/oil-market-report-june-2026>)

California must continue to target investments to support low income and disadvantaged communities in accelerating ZEV adoption.

Studies in the last couple years have shown that although California has been successful in reducing overall PM2.5 transportation emissions, relative pollution exposure inequities persisted or even worsened across AB 617 and SB 535 communities and for people of color.³ Furthermore, while California has invested nearly \$2B in clean vehicle incentives since 2010, only 15% of funds have reached disadvantaged communities (DACs) where electric vehicle adoption continues to lag behind.⁴

Discussions in the most recent Advisory Committee meeting focused on whether or not community impact is being achieved through CTP investments. While the CEC has been fulfilling AB 126's mandate to direct at least 50% of CTP funds towards projects that directly benefit or serve DACs and low-income communities, environmental equity for these communities has not improved accordingly. As such, we recommend increasing investments to 100% into DACs for the 2026-27 CTP investment plan in order to expedite California's ability to address these persistent inequities. This aligns with the Luskin Center's top policy recommendation⁵ to close equity gaps in ZEV adoption by increasing funding for programs that specifically target low-income and disadvantaged communities.

Furthermore, in alignment with previous discussions in the DACAG, we support updating CEC ZEV investment and deployment maps to include overlays for priority communities, so that we can better track our progress in expanding clean transportation equitably and visibly identify gaps.

Prioritize and Coordinate Investments in Affordable Multi-Family Housing Charging

We support CEC's focus on home charging, particularly for residents of multi-family housing and disadvantaged communities. CEC should specifically invest in charging deployment in multi-family affordable housing, as affordable housing developers have identified funding challenges in complying with the 2025 California Green Building Standards Code's mandate⁶ for all parking spaces to be EV-ready. In order to avoid pitting climate and clean transportation

³ Libby H. Koolik et al., "PM2.5 exposure disparities persist despite strict vehicle emissions controls in California," *Science Advances* (September 2024) (<https://doi.org/10.1126/sciadv.adn8544>)

⁴ Rachel Connolly et al., "An Analysis of California Electric Vehicle Incentive Distribution and Vehicle Registration Rates Since 2015," UCLA Luskin Center for Innovation (June 2024) (<https://escholarship.org/uc/item/7ht4t1km>)

⁵ See note 4.

⁶ CHAPTER 4 RESIDENTIAL MANDATORY MEASURES - 2025 CALIFORNIA GREEN BUILDING STANDARDS CODE, TITLE 24, PART 11 (<https://codes.iccsafe.org/content/CAGBC2025P1/chapter-4-residential-mandatory-measures>)

goals against housing goals, we recommend CEC support affordable housers in funding charging infrastructure. Furthermore, while residents of single-family homes are more easily able to take advantage of Clean Cars 4 All's \$2,000 home charging rebate, the same is not true for residents of multi-family homes. As such, CEC should work with CARB and CPUC on multi-family charging investments to coordinate charging infrastructure investments with vehicle incentives and reduced utility rates, thereby streamlining efforts and maximizing impacts.

Prioritize MDHD Investments

We understand the CEC's reasoning for temporarily prioritizing light-duty funding; however, we urge the Commission to return to prioritizing medium- and heavy-duty electrification as soon as possible. The goods movement sector has a disproportionate harmful impact on air pollution and on the health of DACs living near freight corridors⁷. By focusing on MDHD investments going forward, CEC can make maximum use of limited funds and address the persistent equity gap in pollution exposure and health harms.

Support Workforce Training and Development

We support continued investments into ZEV- and charger-related workforce development. As previously written,⁸ CEC has the opportunity to shape the trajectory of the green economy and encourage a just transition by incorporating labor standards and enforcement into CTP funding requirements to ensure that new clean transportation jobs being created are also high-quality, high road jobs⁹ that community members from DACs can access. See UC Berkeley Labor Center's Workforce Standards Toolkit¹⁰ for more information.

Similarly, we recommend that CEC continues to coordinate workforce development investments across agencies with CARB and with community and labor partners to ensure that efforts are streamlined. Wherever possible, utilizing existing union pathways for training and certification

⁷ Guillermo Ortiz, "Breathing in Harm: The Toll of Freight Pollution in California," Natural Resources Defense Council (August 2024) (<https://www.nrdc.org/bio/guillermo-ortiz/breathing-harm-toll-freight-pollution-california>)

⁸ Marissa Wu Comments - The Greenlining Institute Comments on 24-25 CTP Updated Draft (October 2024) (https://links-2.govdelivery.com/CL0/https:%2F%2Fefiling.energy.ca.gov%2FGetDocument.aspx%3FDocumentContentId=95796%26tn=259655%26utm_medium=email%26utm_source=govdelivery/1/01010192b6ce811d-c571e6ed-3f6b-45d4-a1c2-94aafd7a26fa-000000/xr52a6iNChg7VISPhaDVnjvGGqYD8eUgTrstTi8pBrQ=376)

⁹ Carol Zabin, "Putting California on the High Road: A Jobs and Climate Action Plan for 2030", UC Berkeley Labor Center (June 2020) (<https://laborcenter.berkeley.edu/wp-content/uploads/2020/08/Executive-Summary-Putting-California-on-the-High-Road.pdf>)

¹⁰ Factsheet: Workforce Standards for an Equitable Economy, UC Berkeley Labor Center (March 2024) (<https://laborcenter.berkeley.edu/factsheet-workforce-standards-for-an-equitable-economy/>)

can conserve state resources. We support EVITP certification to ensure California's charging technicians perform high-quality and safe work— however, we have also heard that the cost of certification can be prohibitive for small businesses, tribal groups, and others seeking to qualify for state grants. We recommend that CEC considers supporting training fees as part of workforce development investments in order to expand access for Californian workers.

We also uplift comments made during the Advisory Committee meeting on the importance of ensuring that workforce training and certification efforts are connected to real jobs at the end of the pipeline. Certifications should be industry-recognized and responsive to identified gaps in the electrification workforce.

For further workforce development considerations with the CTP, please see our previous comments¹¹.

Comments on Hydrogen

Greenlining has voiced numerous concerns around CEC's hydrogen investments over the last year. These concerns persist. We ask that CEC reference our joint letter¹² on previous years' CTP hydrogen investments, and specifically uplift a few key concerns.

Most pertinently, hydrogen funding should be restricted to only medium- and heavy-duty infrastructure in the CTP. MDHD creates disproportionately high levels of emissions that impact frontline communities along freight corridors. Electrifying MDHD to reduce pollution inequities across the state is a priority that hydrogen can currently support. However, light-duty hydrogen vehicles have not found widespread market success, and we do not support continuing to pour limited state funds into light-duty hydrogen when battery electric vehicles have demonstrated consumer popularity while also being more environmentally-friendly. According to the CEC's own data,¹³ more than 95% of hydrogen is produced from fossil fuels, which runs counter to the CTP's purpose and state climate goals. As such, Greenlining recommends that CEC limits hydrogen investments to only hard-to-electrify MDHD sectors and implements a strong, equity-centered definition that requires investments only go towards green hydrogen. Additionally, we

¹¹ Marissa Wu - Greenlining - Comments on CTP ZEV Workforce Training and Development Strategy (July 2024) (https://links-2.govdelivery.com/CL0/https:%2F%2Fefiling.energy.ca.gov%2FGetDocument.aspx%3FDocumentContentId=93633%26tn=257734%26utm_medium=email%26utm_source=govdelivery/1/01010190a9664033-54412763-8df9-41ea-8065-0ae392185487-000000/u8zA1jXvvV2vU1O_205Ewh5rsdQAIG4MKGMHimwsIEI=361)

¹² 19 Organizations on Hydrogen Concerns in 24-25 CTP Updated Draft (October 2024) (https://links-2.govdelivery.com/CL0/https:%2F%2Fefiling.energy.ca.gov%2FGetDocument.aspx%3FDocumentContentId=95789%26tn=259648%26utm_medium=email%26utm_source=govdelivery/1/01010192b673c6dd-69e15e69-dac4-4d03-9a5d-e9f1d5af040d-000000/tRr75uh_ZV3SNHvBun_jxZsNWhyjyDEiBZvIfgp7kkg=375)

¹³ "Hydrogen Fact Sheet", California Energy Commission (June 2021) (https://www.energy.ca.gov/sites/default/files/2021-06/CEC_Hydrogen_Fact_Sheet_June_2021_ADA.pdf)

ask that undersubscribed hydrogen funds and canceled hydrogen projects should be reallocated into battery electric infrastructure.

Support for Revisiting AB 126 (Reyes) Alternative Funding Options

In December 2025, CEC fulfilled its AB 126 requirement to release an Alternative Funding Options report¹⁴ that explores potential changes to AB 126 fee structures. We support revisiting this exploration, especially in the context of broader discussions that are impacting the Greenhouse Gas Reduction Fund (GGRF) and thereby the overall pot of funding available for clean transportation programs. Where GGRF falls short, the Clean Transportation Program rises up as an important stable source of state funding for clean transportation infrastructure. We ask CEC to hold a workshop on the AB 126 Alternative Funding Options report to gather public feedback and to share next steps to advance this exploration.

We appreciate the opportunity to comment on the CEC's proposed investment plan. We look forward to continuing to track progress on this effort. Please do not hesitate to reach out to me (marissa.wu@greenlining.org) with any questions or to schedule time to discuss our recommendations further.

Best regards,

Marissa (Mars) Wu

Senior Transportation Equity Program Manager

¹⁴ Alternative Funding Options for the Clean Transportation Program, California Energy Commission (December 2025)
(<https://www.energy.ca.gov/publications/2025/alternative-funding-options-clean-transportation-program>)