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2026-2027 Investment Plan Update for the Clean Transportation Program

Additional submitted attachment is included below.



July 8, 2026

Commissioner Nancy Skinner
California Energy Commission
1516 Ninth Street Sacramento, CA 95814
Docket #: 26-ALT-01

Re: 2026-2027 Investment Plan Update for the Clean Transportation Program

Dear Commissioner Skinner,

The Coalition for Clean Air strongly supported the CTP's reauthorization through AB 126 (Reyes) in 2023, particularly its equity requirements. We appreciate the work that went into the 2026-2027 Investment Plan Update for the Clean Transportation Program and the June 30 Advisory Committee meeting, and we offer these comments.

In general, we see a critical need to fund infrastructure for zero-emission medium and heavy-duty vehicles (MHDV) like trucks and buses. Replacing diesel engines that inflict toxic exhaust on our communities with engines that generate no tailpipe pollution is an urgent priority, especially for our low-income communities of color. California's Black, Asian-American and Latino communities are burdened by much greater diesel particulate matter than are our White communities. CEC's investments in ZE infrastructure complement the regulatory structure established by CARB to clean up diesel pollution, and expediting that infrastructure deployment is vital to the success of the zero-emission transition.

Within the MHDV sector, we see a need especially in public agencies, including transit agencies, and school districts that are trying to convert their fleets to zero emissions. Our agencies and schools are operating with constrained budgets and are deserving of CTP assistance to deploy the infrastructure they need in order to adopt battery-electric and hydrogen fleets.

In the light-duty sector, we urge CEC to prioritize multifamily home charging, as well as public fast charging in locations less likely to be served by private investment, because these investments will help overcome barriers to EV adoption by Californians of modest means. As one of the leaders of the Charge Ahead California campaign, we advocate for a zero-emission transportation transition that democratizes the EV and leaves none of our residents behind. We urge CEC to continue to exceed the minimum percentages established by AB 126 for investments in and benefiting disadvantaged and low-income communities, and we commend you for your record of allocating 61% of previous funds to those priority populations. We also appreciate the Communities in Charge program's openness to both Level 1 and Level 2 charging

so that solutions can be tailored to the needs of residents. Level 1 will often be the most cost-effective method.

Fuel-cell electric vehicles may play an important role in medium and heavy-duty transportation, so we believe that public investment in hydrogen fuel should go toward stations that can supply trucks, buses and port equipment. The market has not shown confidence in light-duty hydrogen; despite CEC's massive investment of over \$230 million, we have only 30 retail stations open (according to the CEC website). For these reasons, CEC should restrict its hydrogen-specific funding to medium and heavy-duty vehicle hydrogen infrastructure. The CTP should also assist in greening the hydrogen fuel supply by prioritizing projects that use electrolytic hydrogen, to achieve lower life-cycle emissions of greenhouse gases and air pollution.

In addition to the investments proposed by the draft staff report, CEC has a crucial regulatory role to play in cleaning up transportation, the biggest source of air and climate pollution in our state. We strongly urge the adoption this year of standards for replacement tire efficiency, as proposed by CEC staff. Currently, almost all new cars are equipped with low rolling resistance tires that boost each new car's efficiency and reduce emissions. However, when California consumers go to purchase replacement tires for their cars, they are unaware that almost all replacement tires sold throughout the state are not low-rolling resistance tires. As a result, once they replace their car's tires, they are unknowingly spending more money on fuel, whether it be gasoline, electricity or hydrogen, and increasing the amount of pollution that is caused by their vehicle.

CEC should adopt its proposed Replacement Tire Efficiency Program, a first-in-the-nation tire fuel efficiency standard for passenger vehicle replacement tires sold in California that aligns with the tires sold with new cars, along with consumer outreach and education at the point of sale so California drivers can easily compare tire efficiency, safety, and other attributes.

I look forward to the development of the Investment Plan Update, and to continuing to collaborate on CEC investments and regulations.

Sincerely,

A handwritten signature in cursive script that reads "Bill Magavern".

Bill Magavern
Policy Director