DOCKETED	
Docket Number:	26-ALT-01
Project Title:	2026-2027 Investment Plan Update for the Clean Transportation Program
TN #:	271320
Document Title:	James Tong Comments - Docket 26-ALT-01 — 2026–2027 Investment Plan Update for the Clean Transportation Program
Description:	N/A
Filer:	System
Organization:	James Tong
Submitter Role:	Public
Submission Date:	7/8/2026 12:53:33 PM
Docketed Date:	7/8/2026

Comment Received From: James Tong
Submitted On: 7/8/2026
Docket Number: 26-ALT-01

Docket 26-ALT-01 â€” 2026â€“2027 Investment Plan Update for the Clean Transportation Program

Additional submitted attachment is included below.

July 6, 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

Dear Commissioners:

Mitra EV respectfully submits these comments on the California Energy Commission's (CEC) 2026–2027 Investment Plan Update for the Clean Transportation Program (CTP), Docket 26-ALT-01. Mitra EV works directly with small and medium-sized business (SMB) fleet operators to plan and execute electric vehicle deployments. Our comments reflect the practical realities these operators face and the funding structures that we believe will be most effective in accelerating statewide adoption.

I. We Appreciate the Commission's Leadership on High-Impact Fleet Segments

Mitra EV appreciates the Commission's continued leadership in supporting high-impact fleet segments, including ports, schools, transit agencies, and other priority fleets. These investments are critical to achieving California's clean transportation goals and reducing harmful emissions in communities that have long borne a disproportionate environmental burden. We strongly support the Commission's commitment to directing meaningful resources toward these segments.

II. The Investment Plan Must Maintain Balance Across the Broader Commercial Landscape

At the same time, Mitra EV urges the Commission to ensure that the 2026–2027 Investment Plan maintains meaningful balance across the broader commercial fleet landscape. A strong and exclusive focus on port fleets, for example, can unintentionally concentrate incentive benefits in coastal regions, while missing significant emission reduction opportunities in inland communities including the Central Valley, Sacramento, and the Inland Empire.

Small and medium-sized business fleets operate in every region of California. These include local contractors, service providers, delivery operators, and other commercial businesses that collectively represent a large share of vehicle miles traveled and associated emissions. Supporting the electrification of SMB fleets ensures that both the environmental and economic benefits of the Clean Transportation Program are distributed more equitably across the state.

III. SMB Projects Unlock Larger Market Opportunities

Beyond their direct emissions impact, SMB electrification projects unlock broader market momentum. When a small business successfully deploys its first electric vehicles in connection with a charging hub, it creates visible proof points in the local business community and shared-use infrastructure for other small businesses. SMB projects build confidence among neighboring operators, demonstrate that electrification is operationally viable, and drive follow-on adoption by peers who were previously hesitant.

These early wins are precisely the type of catalytic deployments that enable market transformation at scale. They also help ensure that small businesses, which are the backbone of California's economy, can participate meaningfully in the emerging clean energy economy. Public investment in SMBs' first deployments generates compounding returns that extend well beyond the initial funded project.

IV. The Biggest Barrier for SMBs Is Getting Through the First Step

Mitra EV works directly with SMB fleet operators, and our experience consistently shows that the biggest barrier to electrification is not a lack of interest. It is the complexity of getting through the first step. For a small business, successfully completing an initial EV deployment requires navigating multiple challenges simultaneously:

- Securing adequate charging infrastructure at their facility;
- Understanding and navigating available incentive programs; and
- Making the first deployment work operationally within their existing business.

Each of these steps can be overwhelming for a business without dedicated sustainability or fleet management staff. When program design does not account for this reality, well-intentioned public funding fails to reach the small business operators who need it most.

V. Recommendations for the 2026–2027 Investment Plan

As the Commission considers the 2026–2027 Clean Transportation Program Investment Plan, Mitra EV offers the following recommendations:

A. Prioritize Funding Structures That Help SMBs Take the First Step, Including Through Community Charging Hubs

Public dollars are most powerful when they unlock initial adoption and help a fleet prove the business case for electrification, including through small business charging hubs. We encourage CEC to prioritize structures that reduce barriers for small businesses making their first EV deployment. This includes technical assistance, streamlined applications, and incentive levels that reflect the cost realities of small projects.

B. Maintain Strong Support for Light- and Medium-Duty Commercial Vehicle Charging

The Commission should maintain strong support for infrastructure that supports light- and medium-duty commercial vehicles, particularly Class 2b and Class 3 trucks. These vehicles are commercially available today, are widely used by small businesses across a range of industries, and represent an immediate and actionable opportunity for emissions reduction. Sustained investment in this vehicle class is essential to capturing near-term deployment opportunities while longer-term heavy-duty solutions continue to mature.

C. Design Solicitations That Are Accessible to Small Businesses

Mitra EV urges CEC to design solicitations with streamlined application requirements, smaller award pathways, and scoring criteria that do not unintentionally favor only large incumbent organizations. Complex applications, large minimum project sizes, and scoring metrics that reward fleet scale or organizational sophistication effectively exclude the small business operators who stand to benefit most from CTP investments. Program design should affirmatively account for the resource constraints of SMB applicants.

VI. Conclusion

California's electrification goals will not be achieved until local contractors, service providers, and small commercial fleets can also participate meaningfully in electrification. Mitra EV urges the Commission to make SMB access a central principle of the 2026–2027 Clean Transportation Program Investment Plan.

We appreciate the opportunity to submit these comments and look forward to continuing to engage with the Commission on this important work. Please do not hesitate to contact us with any questions.

Respectfully submitted,

James Tong
Chief Strategy Officer