DOCKETED

Docket Number:	26-ALT-01
Project Title:	2026-2027 Investment Plan Update for the Clean Transportation Program
TN #:	271334
Document Title:	Michael Daft Comments - Electrify America Comments - CTP Advisory Committee Update on Program Modifications
Description:	N/A
Filer:	System
Organization:	Michael Daft
Submitter Role:	Public
Submission Date:	7/8/2026 3:52:50 PM
Docketed Date:	7/8/2026

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

Electrify America Comments - CTP Advisory Committee Update on Program Modifications

Please see our attached comment letter.

Additional submitted attachment is included below.

July 8, 2026

Mabel Aceves Lopez
California Energy Commission (CEC)
715 P Street
Sacramento, California 95814

RE: Electrify America comments on the Clean Transportation Program Advisory Committee Update on Program Modifications

Dear Ms. Aceves Lopez:

Electrify America appreciates the opportunity to comment on the Clean Transportation Program (CTP) Investment Plan Update discussed during the June 30, 2026 Advisory Committee meeting. We first want to thank the California Energy Commission (CEC) for its continued transparency and collaborative engagement throughout the investment planning process. We remain a committed partner to CEC in advancing California's transportation electrification, equity, and climate goals.

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. Programs like the CTP play a meaningful role in supporting that mission, helping to build the reliable, expansive charging network that California drivers and communities depend on.

Concern Regarding the Light-Duty Charging Infrastructure Modification

We write to respectfully flag a concern with one of the proposed modifications to the 2026-2027 Investment Plan Update, as presented at the June 30 Advisory Committee meeting. The updated light-duty charging infrastructure priority now reads: *"Prioritize investments for at- or near-home charging, including at single and multifamily homes, with priority for rental properties."* While Electrify America strongly agrees that near-home charging is critical and we welcome the explicit focus on rental properties, we are concerned that DC fast charging (DCFC) is no longer called out as a distinct priority within the light-duty investment strategy.

As we have highlighted in prior comments, DCFC is not just a supplemental charging option for renters and multi-unit dwelling (MUD) residents. For many of these households, it is the only practical and reliable charging solution. At-home Level 1 and Level 2 installation in multifamily and rental settings is often slow to deploy, dependent on landlord cooperation, and constrained by building electrical infrastructure. DCFC, by contrast, is available today and can serve renters' charging needs no matter their residential situation.

Research Supports DCFC as a Critical Tool for Renter EV Adoption

Renters and MUD residents face a fundamentally different charging reality than homeowners. Research from the 2021 UCLA report has shown that MUD residents rely on fast chargers as their primary charging source more than twice as often as home charging and nearly three times more than public Level 2[1]. While efforts to expand at-home charging in MUD settings have grown since that study, significant technological and infrastructure barriers

[1] *J.R. DeShazo and James Di Filippo. 2021.* "Evaluating Multi-Unit Resident Charging Behavior at Direct Current Fast Charging". *UCLA Luskin Center for Innovation.*

remain, making public DCFC the most deployable near-term solution for renters today. Recent research puts specific numbers behind that gap. A June 2025 UCLA study examining public DCFC availability for renters across urban Los Angeles County, finds that current infrastructure falls short of the baseline needs of renter households, concluding that:

> Approximately 13,492 DCFC ports are needed to meet the projected basic demand from renters. Yet, only 2,533 ports are currently available. Moreover, the existing infrastructure primarily caters to freeway users rather than local renters, intensifying competition for access to public EV fast charging.[2]

These findings make clear that a light-duty investment strategy focused primarily on at- and near-home charging will not, on its own, serve renters or lower-income communities at the scale needed. Without a parallel commitment to public DCFC, many of the residents the CTP is designed to benefit will remain without a reliable path to EV adoption. As the 2025 UCLA study warns, “failure to address the scarcity of public DCFC stations for renters may slow overall EV adoption rates, gradually becoming an environmental justice concern”.

Prioritize Proven Charging Programs

We recognize that projected CTP allocations will decline in the two fiscal years following 2026-2027, making it essential to direct available funds toward proven programs with a demonstrated track record of delivering fast, reliable charging in underserved communities. We encourage CEC staff to continue supporting DCFC programs as a core component of the light-duty investment strategy.

CALeVIP 2.0, announced for Fall 2026, is a robust and well-understood program purpose-built for public fast charging. "We are encouraged to see CALeVIP 2.0 on the horizon and believe it will be a critical tool for reaching renter-dense communities that have long lacked reliable public fast charging access.

Our Continued Support

Electrify America remains committed to partnering with the CEC to advance California's transportation, equity, and climate priorities. We respectfully urge staff to include DCFC as a named priority alongside near-home charging, so the Investment Plan reflects the full range of tools needed to serve renters and lower-income Californians. We look forward to continuing to engage as the 2026-2027 CTP Investment Plan Update is developed and welcome any opportunity to discuss these comments further.

Sincerely,

Michael Daft
Gov’t Affairs & Public Policy Lead – State Government
Electrify America, LLC

[2] *Quentin Grellier. 2025. EV Public Fast Charging for Urban Renters: A Study of the Public DC Fast Charging Stations Needs in Urban Los Angeles County.* UCLA Luskin School of Public Affairs.