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CalETC's Comments on CTP Investment Plan Update - No Hyperlinks 2

Additional submitted attachment is included below.



July 8, 2026

California Energy Commission
Docket No. 26-ALT-01
715 P Street Sacramento, CA 95814

Submitted electronically to <https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=26-ALT-01>

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

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the updates to the Draft 2026-2027 Investment Plan Update for the Clean Transportation Program (Investment Plan). CalETC would like to thank the CEC and the Advisory Committee for all your hard work on the Clean Transportation Program (CTP) and your commitment to developing equitable, reliable, and ubiquitous zero-emission charging and hydrogen fueling networks across the state.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, and other industry leaders supporting transportation electrification.

CalETC supports the continued prioritization of the CEC's signature block grant programs, CALeVIP, Communities in Charge, and EnergiIZE to rapidly deploy infrastructure at scale. The pace of EV adoption and the state's ambitious goals requires us to use the fastest approach for established charging and hydrogen refueling market segments. The block grant programs are competitive, require submission of significant documentation, and the CEC's third-party administrators scrutinize applications to ensure awards are made to reputable applicants. Even with this thorough oversight, the turnaround for the most recent CALeVIP 2.0 was only three months between the application deadline and notice of award.ⁱ The CEC's funding can be deployed thoughtfully and rapidly through its signature block grant programs to meet our shared charging goals.

CalETC commends the CEC for setting two windows of funding for CALeVIP in October 2026 and February 2027. We continue to encourage the CEC to set and maintain regular funding windows to provide clarity on the timing of future funding opportunities and give project proponents the ability to plan and scale their investments to meet our shared EV infrastructure goals.

While we cannot control the state's budget, the CTP budget is fairly predictable with around \$100 million annually, which can provide consistent funding to the signature block grant programs. Charging station developers have other markets than California to develop, including Texas and Colorado, and can plan their investments in those states more easily. California can maintain a competitive advantage to draw private investment in infrastructure deployment to the state by setting a clear schedule for CALeVIP, Communities in Charge, and EnergiIZE.

CalETC recommends the CEC review the Level 1 EV charging options in the Communities in Charge Program and revise them to improve charging deployments. Level 1 can be a convenient charging option for drivers when there is sufficient parking to allow drivers to charge for long periods of time. Research by Peninsula Clean Energy has shown that Level 1 charging would meet about 95% of everyday drivers' needs.ⁱⁱ However, no Level 1 projects were approved through Communities in Charge since being incorporated into the program. We need to rapidly scale charging infrastructure, and all solutions must be funded to reach our 2030 goals. Therefore, we encourage the CEC to review the requirements for Level 1 charging deployments that meet the required safety and technology standards as eligible equipment in the Communities in Charge Program.

CalETC continues to recommend that a portion of CTP funds support public agency fleets. Public fleets remain subject to the Advanced Clean Fleet Rule and need financial assistance to transition their fleets. Small public agencies and publicly owned utilities are typically less well capitalized and need their vehicles to perform a wide variety of functions. Additionally, eligible public fleets should have the flexibility to pursue EV charging strategies in line with their fleet needs. We recommend the CEC carefully review program rules to ensure that project applicants are incentivized to pursue right-sized EV charging strategies and not inadvertently required to install a greater quantity of chargers or chargers at high minimum power thresholds than needed to comply with program requirements. Ensuring that public agencies can access CTP funding would provide critical financial assistance to these resource constrained agencies.

CalETC recommends revising the claim that plug-in electric vehicle sales remained steady in 2025.ⁱⁱⁱ New ZEV sales peaked in Q3 of 2025 at 29% and then dipped in Q4 to 19%, with the months of November and December falling below 13%.^{iv} We have not seen these sales numbers since 2021. The drastic pullback by the federal government caused this precipitous sales drop and has only put more emphasis on how important the CTP is as a way to effectively roll out ZEV refueling infrastructure and reduce concerns around charging access, range anxiety, and reliability.

Thank you for your consideration of our comments. Please do not hesitate to contact me at Laura@caletc.com should you have any questions.

Kind regards,



Laura Renger
Executive Director

ⁱ Applications were due December 12, 2023, and awardees were notified by March 4, 2024. See <https://calevip.org/incentive-project/gssp-incentive-north-south>.

ⁱⁱ Commute & Multifamily EV Charging Level Needs Analysis, Peninsula Clean Energy, Available at <https://www.peninsulacleanenergy.com/wp-content/uploads/2021/09/Determining-the-Appropriate-Level-of-Power-Sharing-for-EV-Charging-in-Multifamily-Properties.pdf>.

ⁱⁱⁱ See Page 8 of Draft Investment Plan, "California plug-in electric vehicle sales (battery-electric and plug-in hybrid electric vehicles) remained steady in 2025 despite the cancelation of federal incentives."

^{iv} California New Car Dealers Association Releases Q4 2025 Auto Outlook, January 21, 2026, CNCDA, available at <https://www.cncda.org/news/california-new-car-dealers-association-releases-q4-2025-auto-outlook/>.