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Program Design Challenges

Additional submitted attachment is included below.

July 24, 2026

RE: Public Comment on the 2026–2027 Draft Clean Transportation Investment Plan

To Whom It May Concern:

The EV-O-LUTION Collaborative, convened by the Electric Transportation Community Development Corporation (ETcommunity), respectfully submits the following comments regarding the California Energy Commission's 2026–2027 Draft Clean Transportation Investment Plan.

The Collaborative represents more than fifteen community-based organizations, faith institutions, veteran's services, educational institutions, and community partners working collectively to ensure that California's transition to a zero-emission transportation future includes the communities that have historically been the last to benefit from public investment.

The Collaborative appreciates the Commission's continued commitment to equity and recognizes Commissioner Skinner's recent acknowledgment that bundled incentives and layered funding opportunities are necessary to successfully deploy charging infrastructure in disadvantaged and low-income communities.

That acknowledgement reflects what our partners have consistently communicated over the past three years.

Unfortunately, our collective experience navigating California's clean transportation funding ecosystem demonstrates a significant gap between the state's equity goals and the realities of implementation.

The EV-O-LUTION Collaborative was established in June 2023 as an extension of ETcommunity's Prove It! Campaign, organizing community partners in anticipation of a California Energy Commission funding opportunity expected to support electric vehicle infrastructure in underserved urban communities from concept through completion. That opportunity never materialized.

Instead, the Collaborative was redirected to Calstart's Communities in Charge program.

With fewer than fifteen days' notice, Collaborative staff and partners prepared and submitted two applications on behalf of community organizations during Wave 3. From the beginning, the Collaborative was transparent regarding a fundamental reality: disadvantaged communities do not possess the financial capacity to absorb six-figure infrastructure gaps. Any public investment would need to function either as a standalone funding source or be intentionally designed to stack with complementary programs.

The applications were initially denied in March 2025.

Only after requesting a debrief and providing constructive feedback was the Collaborative informed that a contingency award process existed—a process that had never been communicated in the original award notification. Shortly thereafter, in May 2025, both applications were unexpectedly awarded.

While the awards were welcomed, the implementation challenges had only begun.

For months, the Collaborative searched unsuccessfully for qualified electrical contractors willing to complete projects under the program's requirements. Eventually, an extension request was approved; however, there was no indication that both allowable program extensions had effectively been consumed during that approval process.

When a qualified contractor was finally secured in December 2025, the actual project costs fundamentally changed the understanding of what the awards could realistically accomplish.

One partner site required approximately $46,000 before permitting and charger acquisition.

A second partner site required approximately $97,000 before trenching, permitting, and charger acquisition.

Together, project costs exceeded $143,000 while the combined award totaled approximately $74,000.

The reality became unmistakable.

The funding was never sufficient to move these projects from concept to completion.

Nevertheless, the Collaborative continued moving forward because the commitment has never been simply to grant administration—it has always been to the community partners who trusted the process and committed their time, staff capacity, and reputations in pursuit of California's clean transportation goals.

To close the funding gap, the Collaborative was encouraged to pursue Southern California Edison's Charge Ready programs.

What followed was months of conflicting guidance, repeated application revisions, rescinded approvals, engineering discrepancies, and prolonged delays.

The Collaborative's electrical contractor determined one project could utilize existing electrical service.

Southern California Edison determined the same project required entirely new electrical service or transformer upgrades.

It then took more than sixty days to reconcile inaccurate utility records before meaningful progress could continue.

These experiences reveal a larger truth.

Communities that have experienced decades of underinvestment cannot compete under funding models designed around equal treatment rather than equitable outcomes.

Disadvantaged communities begin from fundamentally different starting points.

Yet current funding structures continue expecting them to contribute significant capital while simultaneously identifying them as communities requiring public investment.

Those two assumptions cannot coexist.

Either these communities are disadvantaged, or they possess the discretionary resources necessary to absorb substantial infrastructure costs.

Both cannot be true.

Then, in April 2026, after months of pursuing complementary funding with the knowledge of both Calstart and California Energy Commission staff, the Collaborative was informed that an updated implementation handbook prohibited stacking funding with other incentive programs.

There was no clear explanation regarding when this policy changed, why it changed, or how organizations already operating under previous guidance should respond.

The Collaborative sought clarification directly from Commission staff because stacking had never been a hidden strategy. It had been openly communicated from project conception as the only realistic path toward completion.

The response communicated, in effect, that because some applicants elsewhere had exploited a profit loophole, all future applicants would bear the consequences.

Weeks later, Commissioner Skinner publicly affirmed what the Collaborative had consistently argued—that bundled incentives and layered funding are necessary to achieve equitable deployment.

That acknowledgement was encouraging.

However, implementation policies have yet to reflect that understanding.

Today, after three years of persistent work, countless stakeholder meetings, technical assistance sessions, public roundtables, engineering reviews, and advocacy efforts, the Collaborative remains no closer to delivering operational charging infrastructure for many partner communities than when this work first began.

Three partner sites in Anaheim, Compton, and San Bernardino—representing twenty-four charging ports—remain dependent upon another public agency to determine whether remaining funding gaps can be closed.

This is not because these communities' lacked commitment.

It is not because they failed to organize.

It is not because they failed to complete the work.

It is because the systems intended to support disadvantaged communities remain fragmented, misaligned, and insufficiently designed for the realities those communities face.

The Collaborative's experience extends beyond these three projects.

Following nearly six months of advocacy with Southern California Edison, meaningful progress was made in highlighting the significant gap between programs supporting a maximum of four charging ports and those requiring a minimum of twenty. The resulting ten-port pathway represented an important improvement.

Yet when eight partner locations were submitted for consideration, only two were identified as potentially viable.

Without explicitly stating it, the message was unmistakable:

The remaining communities were simply too far behind to justify investment.

That is precisely the narrative the EV-O-LUTION Collaborative was established to challenge.

California cannot achieve its clean transportation goals by investing only where success is easiest.

The state's climate and equity commitments will only be realized by intentionally investing where barriers are greatest.

Accordingly, the EV-O-LUTION Collaborative respectfully urges the Commission to:

- Design funding opportunities capable of supporting projects from planning through completion.
- Restore and clearly authorize strategic stacking of public funding where it closes legitimate financing gaps rather than creates opportunities for private profit.
- Better align state agencies, utilities, and program administrators so applicants receive consistent guidance instead of contradictory direction.
- Develop implementation models rooted in equitable outcomes rather than identical treatment.
- Measure program success not simply by dollars awarded, but by operational charging infrastructure successfully deployed within historically underserved communities.

The EV-O-LUTION Collaborative remains committed to partnering with the California Energy Commission because we believe California can lead the nation in equitable clean transportation deployment.

Leadership, however, requires more than ambitious policy goals.

It requires implementation systems that work for the communities furthest from opportunity.

For three years, our partners have continued to show up, collaborate, innovate, and persevere despite repeated setbacks.

We respectfully ask the Commission to demonstrate the same commitment by ensuring that future programs are designed not merely to award funding, but to deliver successful outcomes for the communities they are intended to serve.

Only then will California's clean transportation future truly belong to all Californians.

Respectfully,
Electric Transportation Community Development Corporation (ETcommunity) |
EV-O-LUTION Collaborative Partners

Simple, INNOVATIONS.
The Dorsey Group
American Legion Post 710, San Bernardino
Calvary Baptist Church, Hawthorne
Carson Community Deliverance Church
Church ONE, Long Beach
Community Action Partnership, Orange County
Faith & Community Empowerment, Los Angeles
Homan United Methodist Church, Los Angeles
Immanuel Praise Fellowship, Rancho Cucamonga
MH Church of Compton
Prevailing in Christ Ministries, Carson
Primm AME, Pomona
Word of Encouragement Church, Hawthorne

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