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December 12, 2017

Commissioner Janea A. Scott
California Energy Commission
1516 9th Street
Sacramento, CA 95814

Subject: Comments on the Draft 2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program

Dear Commissioner Scott,

Thank you for your leadership on the draft FY 2018-19 funding plan and for the opportunity to submit the following comments for Energy Commission consideration.

We agree with the [2016 ZEV Action Plan](#) (p25) recommendation that the Energy Commission “[c]ontinue to support activities identified in Regional ZEV Readiness Plans such as infrastructure permitting, siting and installation processes as well as ZEV awareness, local government code adoption and training”. We appreciate the Energy Commission’s consideration of releasing existing FY 2016-17 funding for this category. We recommend also allocating \$3 million in the FY 2018-19 investment plan for these activities, which are critical in supporting California’s ambitious ZEV deployment goals (see [ARB’s Mobile Source Strategy](#)).

For example, it is well known that pre-wiring buildings for ZEV charging infrastructure during initial construction is simpler and more cost effective than retrofitting a building once occupied. To address this, the state currently requires Electric Vehicle (EV) Readiness at 3% of newly constructed multifamily parking spaces. However, this requirement alone will not enable California to meet its ambitious ZEV deployment goals. This is where development and adoption of local codes are critically important.

To that end, the City of Santa Monica recently passed an Electric Vehicle Action Plan, which includes recommendations to increase existing requirements for EV-ready parking spaces in both residential and commercial new construction. New multi-family buildings will be required to supply a minimum of one EV-ready space per unit (where parking is required) and new commercial parking facilities will be required to ensure 20% of parking spaces are EV-ready.

These new reach codes, once adopted, will help increase access to EV charging throughout the City; however, significant barriers remain for adding EV charging infrastructure in existing buildings. Including funding in FY 2018-19 for ongoing EV Readiness would enable local governments, including Santa Monica, to address financial barriers associated with charging infrastructure deployment. Without prioritizing solutions development to address these barriers, local governments will be limited in advancing ZEV adoption.

Finally, we very much appreciate that the Energy Commission has identified infrastructure for medium- and heavy-duty vehicles, which are a major source of local criteria air pollutants, as a priority. Because of their strong relationships with the community, including private sector fleets, tech companies, and distribution points like Ports and airports, local governments are well positioned to utilize FY 2018-19 funding to develop pilot projects that provide technical assistance and lead to market transformation of medium-duty delivery and passenger shuttle applications. Thanks again for the Energy Commission's ongoing support of initiatives that help to advance the climate action goals of local governments and the State of California.

Sincerely,

A handwritten signature in black ink, appearing to read 'DK', with a horizontal line extending to the right.

Dean Kubani
Chief Sustainability Officer, Assistant Director of Public Works
City of Santa Monica