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CalETC Support Comments for Revised Clean Transportation Program Investment Plan

Additional submitted attachment is included below.

August 9, 2019

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 18-ALT-01
1516 Ninth Street
Sacramento, CA 95814-5512

Submitted via electronic commenting system for docket 18-ALT-01

Re: **Revised 2019-2020 Investment Plan Update for the Clean Transportation Program**

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide its support for the California Energy Commission's 2019-2020 Investment Plan Update for the Clean Transportation Program, formerly known as the Alternative and Renewable Fuel and Vehicle Technology Program. As a member of the Advisory Committee for the Clean Transportation Program, CalETC provided verbal support and feedback for the revised Investment Plan on August 5, 2019. This letter echoes the support and feedback provided during that meeting.

CalETC supports and advocates for the transition to a zero-emission transportation future as a means to spur economic growth, fuel diversity and energy independence, ensure 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: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, and the Southern California Public Power Authority. Our membership also includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, and other industry leaders supporting transportation electrification.

California has goals to deploy 1.5 million zero-emission vehicles (ZEVs) and 250,000 electric vehicle (EV) charging stations, including 10,000 DC fast chargers, by 2025.[1] California also has a goal of

[1] Former Governor Edmund G. Brown Jr. Executive Order B-16-2012 set the goal of placing 1.5 million zero-emission vehicles on California's roads by 2025. Former Governor Edmund G. Brown's Executive Order B-48-18 set the goal of 250,000 electric vehicle charging stations, including 10,000 DCFC charging stations, by 2025. In addition, the Charge Ahead California Initiative, [SB 1275 (De León), Chapter 530, Statutes of 2014] set the goal of placing 1 million zero- and near-zero-emission vehicles into service on California's roads by 2023.

deploying 5 million zero-emission vehicles by 2030,[2] which will require even further scale-up of the charging infrastructure for EVs. The state currently has slightly over 4,100 public L2 charging stations, and slightly over 588 public direct current fast charging (DCFC) stations.[3] As recognized by the Commission in the revised Investment Plan, California has a long way to go to meet its zero-emission vehicle and fueling targets, as well as the air-quality and climate-change targets underpinning these targets.

The revised Investment Plan proposed to allocate $32.7 million for light-duty EV charging infrastructure, $30 million for medium- and heavy-duty ZEVs and infrastructure, $20 million for hydrogen refueling infrastructure, $10 million for zero- and near-zero-carbon fuel production, and $2.5 million for workforce development.[4] **CalETC supports the emphasis on zero-emission vehicles and infrastructure and supports these proposed allocations.** We look forward to providing additional input as the funding for these categories is further divided into programs and as solicitations are developed.

We recognize that the funding need for advanced-technology vehicles and infrastructure to realize California's ZEV, air quality, climate change, public health, and economic goals is much higher than the available funding for programs like this one and the California Air Resources Board's (CARB's) Low Carbon Transportation Program. Given limited public funding, we find the prioritization of zero-emission vehicles and infrastructure appropriate and necessary.

The Clean Transportation Program is one of a suite of funding programs and policies supporting California's shift to a cleaner transportation sector, and complements these other policies. For example, CARB recently adopted the Innovative Clean Transit and Zero-Emission Airport Shuttle Bus regulations, which require these sectors to transition fully to zero-emission technologies. CARB is also considering additional measures to transition other segments of the light-, medium-, and heavy-duty vehicle and technology categories to zero-emissions.

As the state's fleet of vehicles and equipment transitions to zero-emission technologies, it makes sense for the Clean Transportation Program funding to align with this direction. Utilities, vehicle manufacturers, charging station providers, and others are investing significantly in the ZEV market

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[2] Former Governor Edmund G. Brown Jr. Executive Order B-48-18 set the goal of 5 million zero-emission vehicles on California's roads by 2030.

[3] Data from www.afdc.energy.gov. Accessed on August 7, 2019. This does not include non-public stations or Tesla stations, and represents 15,957 public L2 charging *connectors* and 1,624 public DCFC charging *connectors*.

[4] Brecht, Patrick and Jacob Orenberg. 2019. 2019-2020 Investment Plan Update for the Clean Transportation Program. California Energy Commission, Fuels and Transportation Division. Publication Number: CEC-600-2018-005-LCF-REV. P. 8.

and the Energy Commission's prioritization of funding for ZEVs sends a clear market signal of continued state commitment.

As mentioned during the meeting, CalETC also finds the division between light-duty and medium- and heavy-duty funding appropriate. The market for light-duty EVs is rapidly growing, with 626,824 ZEVs currently on California roads and 47 ZEV models available for Californians.[5] However, the lack of adequate public charging infrastructure remains a key barrier to accelerating the purchase of ZEVs by consumers and fleets.[6]

In addition, we are noticing a surge in public DCFC usage by transportation network company drivers. Ride-hailing, ride-sharing, and car-sharing applications present a unique opportunity to educate drivers and riders about the benefits of EVs and can provide zero-emission mobility options for low-income and disadvantaged communities.[7] While increased DCFC station usage is beneficial for increasing station utilization, helping the business case for charging station providers, and increasing the share of electric zero-emission miles traveled, it also causes congestion for the limited network of public DCFC stations available. We encourage the Energy Commission to consider current and future usage of DCFC stations by unique use cases, such as these, as the Commission develops programs and allocates Clean Transportation Program funding.

The medium- and heavy-duty ZEV market is growing, and we anticipate an increasing number of regulations aimed at transitioning this sector to zero-emissions technologies in the next few years. It's important for the Clean Transportation Program to fund medium- and heavy-duty zero-emission vehicles and infrastructure as this market grows and as manufacturers and fleets are required to produce and buy, respectively, zero-emission technologies.

Regarding the final discussion question posed for the Advisory Committee and stakeholders on equity, CalETC appreciates the Disadvantaged Communities (DAC) Advisory Committee's thoughtful recommendations during the meeting. The Chair and members of the DAC Advisory

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[5] Data from https://www.veloz.org/sales-dashboard/. Accessed on August 7, 2019.
[6] See, e.g., Want to buy an electric vehicle? Here's pros, cons from an owner who knows, https://www.fresnobee.com/opinion/readers-opinion/article233579777.html#storylink=cpy, August 6, 2019; The World Still Doesn't Have Enough Places to Plug In Cars, https://www.bloomberg.com/news/features/2019-02-14/the-world-still-doesn-t-have-enough-places-to-plug-in-cars, February 14, 2019; Poll Suggests Lack Of Charging Stations Is Biggest EV Buying Deterrent, https://insideevs.com/news/338176/poll-suggests-lack-of-charging-stations-is-biggest-ev-buying-deterrent/, June 22, 2018.
[7] See, e.g., Our Community Car Share, a pilot car sharing program to benefit disadvantaged communities in the greater Sacramento area http://www.airquality.org/residents/incentive-programs/community-carshare-program; and Express Drive EV rentals offered by Lyft, a rental program which allows those who don't own a vehicle to earn with Lyft https://blog.lyft.com/posts/2019/2/6/making-cities-more-liveable-with-electric-vehicles.

Committee provided helpful equity metrics for the Commission's consideration as it allocates funding and develops programs. CalETC is supportive of ensuring an appropriate equity framework and equity metrics are included in the Commission's next steps. We also support including additional equity representation on the Clean Transportation Program Advisory Committee. There were multiple suggestions to include community-based organizations, and we recommend continued coordination with the DAC AC to determine appropriate representatives.

Thank you for your consideration of our comments. Please do not hesitate to contact me at (916) 551-1943 or hannah@caletc.com should you have any questions.

Sincerely,

Hannah Goldsmith
Deputy Executive Director
California Electric Transportation Coalition