

DOCKETED

Docket Number:	19-ALT-01
Project Title:	2020-2021 Investment Plan Update for the Clean Transportation Program
TN #:	232573
Document Title:	California Electric Transportation Coalition Comments - CalETC Comments Draft Staff Report 2020-2023 CTP Investment Plan Final
Description:	N/A
Filer:	System
Organization:	California Electric Transportation Coalition
Submitter Role:	Public
Submission Date:	3/27/2020 3:36:55 PM
Docketed Date:	3/27/2020

*Comment Received From: California Electric Transportation Coalition
Submitted On: 3/27/2020
Docket Number: 19-ALT-01*

**CaIETC Comments Draft Staff Report 2020-2023 CTP Investment
Plan Final**

Additional submitted attachment is included below.



March 27, 2020

California Energy Commission
Re: Docket No. 19-ALT-01
1516 Ninth Street
Sacramento, CA 95814-5512

Submitted via electronic commenting system for docket 19-ALT-01

Re: Draft Staff Report: 2020-2023 Investment Plan Update for the Clean Transportation Program

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments in support of the Draft Staff Report on the Investment Plan Update for the Clean Transportation Program. As a member of the Advisory Committee for the Clean Transportation Program, CalETC provided some verbal feedback for the revised Investment Plan on March 4, 2020. This letter is intended to reiterate our support of the direction the Draft Staff Report establishes and the multi-year funding approach, as well as to provide more thorough feedback for consideration by the CEC staff and Lead Commissioner Monahan.

CalETC supports and advocates for the transition to a zero-emission transportation future 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 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, the Southern California Public Power Authority and the Northern California Power Agency. In addition to electric utilities, 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 direct current fast chargers (DCFC), by 2025.¹ California also has a goal of deploying 5 million ZEVs by 2030,² which will require even further scale-up of the charging infrastructure for EVs. The state currently has about 37,400 public Level2 charging

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.

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.

stations, and 2,900 public DCFC stations.³ California has a long way to go to meet its ZEV and charging station targets, as well as the air-quality and climate-change targets underpinning these targets.

Our comments are provided below by section in the Draft Staff Report.

Executive Summary

- CalETC appreciates the staff's clear recognition that electric vehicle infrastructure investments currently being made by the utilities, private sector and public sector are insufficient to meet the state's goals.
- We support the increased investment in charging infrastructure and agree this increased investment is consistent with state policy and goals.
- CalETC respectfully suggests that a portion of the additional \$51 million in the Governor's 2020-2021 proposed budget be allocated to support charging infrastructure essential to the success of the medium- and heavy-duty zero-emission vehicle market. This market will be very challenging, and it is imperative that the fueling infrastructure be available before trucks and buses are delivered. Additionally, CARB is considering a multitude of ZEV mandates for medium- and heavy-duty trucks; these mandates will only succeed if the essential charging infrastructure is available to support the mandated trucks. We recommend the \$51 million one-time budget allocation be inclusive of infrastructure to support light-, medium- and heavy-duty charging goals and market. CalETC would like to work with CEC staff to best determine how to structure the allocation to support the important CALeVIP program and include additional charging infrastructure investments for medium- and heavy-duty vehicles.

Zero-Emission Vehicles and Infrastructure

- CalETC lauds the staff's recognition that a convenient, reliable network of public charging stations is essential to ensure that all Californians have access to ZEVs. Further, we agree that additional and increased public funding will be essential to meeting the state's ZEV goals, to ensure equity in accessibility to zero-emission mobility, and to ensure the success of the medium- and heavy-duty zero-emission truck rules being considered.
- CalETC supports the CALeVIP program and asks staff to explore mechanisms to better manage the queue of applications, as well as minimize applicant attrition upfront.
- We respectfully suggest that investment in Level 1 charging be considered to expand access to EVs and charging infrastructure for all Californians, including those in disadvantaged and rural communities, for the following reasons:
 - Public investments in Level 1 charging infrastructure is an attractive alternative to support daily charging needs in addition to Level 2 and DCFC infrastructure investments. About half of the EV drivers residing in single family homes with

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*.

access to off-street parking, charge EVs using Level 1 charging at home. For multi-unit dwellings, workplaces and other areas of long dwell time (8 hours or more), Level 1 charging infrastructure is affordable and has minimal, if any, grid impacts.

- DCFC infrastructure, while essential to expand the range of battery-electric vehicles and provide an option for EV drivers unable to charge at work or at home, is a more costly means of charging electric vehicles than home or workplace charging. Additionally, its grid impacts will need to be observed as electric vehicle service providers transition to higher and higher power as battery capabilities evolve. For these reasons, public investment in DCFC infrastructure should not be the sole option for ensuring charging infrastructure accessibility for all. Given the higher costs of public charging as opposed to charging at home, the CEC may consider exploring solutions (e.g. vouchers) to ensure cost parity for drivers who have no other option but to access a public charger.
- It is imperative that the state's investments are made in such a way as to ensure that residents in multi-unit dwellings and disadvantaged communities and/or low-income communities do not face higher electricity costs for their vehicle charging, relative to more affluent ZEV drivers.
- CalETC supports the staff's recommendation to increase access to eMobility options, particularly in rural, tribal and/or disadvantaged communities.

Zero- and Near-Zero Carbon Fuel Production and Supply

- CalETC recommends including renewable electricity in this allocation. Expanding access to renewable electricity fuel, particularly in areas where access to electricity is unreliable or non-existent or in low-income and/or disadvantaged communities, would result in more equitable access to renewable electricity fuel and EVs.

Manufacturing

- The Clean Transportation Program investments in ZEV manufacturing have been essential to creating and retaining good jobs. CalETC supports the staff's recommended investments in zero-emission technology manufacturing. While we cannot comment on whether the recommended allocation is adequate, we are committed to working with staff and other Advisory Committee members to better understand whether the amount and alternating year approach to this allocation is enough to accelerate ZEV manufacturing in California.

Workforce Training and Development

- CalETC supports the recommended investments in workforce training and development and will work with CEC staff to better understand the need as it relates to a rapidly accelerating ZEV market inclusive of medium- and heavy-duty electric vehicles.

School Bus Replacement Program

- CalETC strongly supports the \$14 million allocation to provide the necessary charging infrastructure to operate zero-emission school buses funded through Proposition 39. This

California Energy Commission, Docket No. 19-ALT-01

March 27, 2020

Re: Draft Staff Report: 2020-2023 Investment Plan Update for the Clean Transportation Program

Page 4

kind of partnership in funding, recognizing the necessity for charging infrastructure to support zero-emission school buses, is an excellent example of coordination across state agencies to meet challenging state goals.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Eileen W. Tutt". The signature is fluid and cursive, with the first name "Eileen" and last name "Tutt" clearly distinguishable.

Eileen Wenger Tutt, Executive Director
California Electric Transportation Coalition