

DOCKETED

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ARC Alternatives Comments on Draft Blueprint Concept

Additional submitted attachment is included below.



April 16, 2020

Ms. Katie Herter
California Energy Commission
via E-Commenting System

Subject: Docket #19-TRAN-02, Blueprints for MD/HD ZEVs and ZEV Infrastructure
Comments on Draft Solicitation Concept

Dear Ms. Herter:

ARC Alternatives is a California small business working at the intersection of clean energy and transportation for public sector and institutional clients throughout the state. Our mission is to help our clients cost effectively realize their sustainability initiatives in concert with their critical fiscal, operational, and educational goals. We'd like to offer the following comments on the draft Blueprint solicitation:

- 1) *Introduction and Section 8.* Given the level of interest in the workshop, we are concerned that the volume of qualified applications for Blueprint funds will immediately outstrip available funding. As a result, the "first-come/first-served" approach may not be in the CEC's best interest, rewarding speed of minimally compliant applications over quality of approach. We suggest that a due date for applications be set. If on that date, all applications that meet the cut-off and pass the pass/fail criteria exceed the available funding, a simple ranking system should be employed to award the most qualified applicants. The ranking could be established by assigning a numerical score to a subset of the Scoring Criteria already proposed in the draft concept. If qualified applications do not exceed funding, the ranking system would not need to be used and additional applications could be accepted on a first-come/first-served basis until funding is exhausted.

- 2) *Section 5.* Please clarify that the second bullet for minimum eligibility "Build upon, but not be duplicative of previous planning efforts funded through the CEC" does not imply that previous planning must have been completed, only that if it has, planning under this grant will not be duplicative. We suggest using similar language to what is in the scoring criteria, where it states "If an existing ZEV readiness plan or blueprint exists, Applicants must demonstrate that the proposed project expands upon and is coordinated and consistent with the existing plan."

- 3) *Section 5*. Please confirm that school districts could have eligible projects and would not be precluded from pursuing Blueprint funds. Many districts are considering EV bus fleets, but there is a very little money available for the early planning required – this funding is an ideal opportunity to engage in that planning effort and coordinate with regional entities, providing a true blueprint for others.

Thank you for circulating the Draft Solicitation Concept. We appreciate the opportunity for early engagement and to review and comment on the document.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew D. Meiman". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

Andrew D. Meiman
Principal, ARC Alternatives