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## **EBCE's Comments on the Lead Commissioner Report for the 2020-2023 Investment Plan Update for the Clean Transportation Program**

EBCE fully supports and encourages the FY 2020-2021 Investment Plan to include the one-time legislative appropriation from the ARFVT Fund for \$51M to increase and accelerate EV charging infrastructure. If this funding is not included in the Investment Plan, we encourage the CEC to re-direct a portion of funding in FY 2020-2021 from Hydrogen Refueling Infrastructure toward Light-Duty EV Charging Infrastructure. The Report notes that the existing hydrogen fueling network in CA is effectively serving the state's fuel cell vehicle population and notes that the state is on track to meeting its 2025 and 2030 goals for hydrogen fueling station deployment. Meanwhile, the report notes that EV charging infrastructure is lagging behind EV adoption in CA, and that the state is currently projected to fall short of its 2025 and 2030 EV charger deployment goals. Therefore, we encourage the CEC to more proportionately allocate funding toward Light-Duty EV Charging Infrastructure to better fill the projected deployment gap, in the case that the one-time \$51M allocation is not included in the FY 2020-2021 Investment Plan.

EBCE supports the strategy of front-loading investments in light-duty EV charging infrastructure and back-loading investments in medium- and heavy-duty EV charging infrastructure. To that point, we suggest the funding allocations for the latter be back-loaded more proportionately than is currently proposed. We encourage the CEC to re-direct a portion of the 2020-2021 and 2021-2022 funds for this category to 2023. Many medium- and heavy-duty EVs aren't expected to be available until these later years and aren't expected to reach cost parity with their diesel counterparts until the late 2020s. This will likely lead to later uptake of these vehicles, which will lead to a greater need for charging infrastructure incentives later on.

EBCE's medium- and heavy-duty stakeholders have informed us that workforce training and development is going to be critical to make EV adoption feasible for fleet operators, both in terms of having a sufficient workforce of drivers and technicians to maintain both the vehicles and the charging infrastructure. We support the CEC's intent to focus funding within the Manufacturing and the Recovery and Reinvestment activities on job creation, both of which seem to have Workforce Training and Development components. We encourage the CEC to work closely with the Disadvantaged Communities Advisory Group, as well as members of this Advisory Committee who are focused on workforce development to ensure that funds within each of these activities are used to promote equitable opportunities within our historically disadvantaged communities that we know are disproportionately affected by the health and economic crises associated with COVID-19.

Several members of the Advisory Committee encouraged the CEC to release Investment Plan funding as quickly as possible in order to help counteract the impacts of COVID-19. In addition to that point, EBCE encourages the CEC to utilize the first-come, first-served funding mechanism more often, as opposed to the competitive

solicitation funding mechanism. As noted in the Report, the first-come, first-served mechanism allows for funding to be administered more quickly and with additional security to project applicants. The lack of certainty associated with competitive solicitations may discourage project teams from submitting applications. Particularly for project applicants that are heavily impacted by COVID, the amount of time and resources it takes to coordinate a competitive grant proposal cannot be understated, and project teams assume tremendous risk with no guarantee of selection and funding. Providing clear eligibility requirements and distributing funds on a first-come, first-served basis reduces this stakeholder risk and ensures well developed projects will be deployed in a timely manner.