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EBCE's Comments on the Investment Plan Update for the Clean Transportation Program

Additional submitted attachment is included below.



October 21, 2020

RE: 2020-2023 Investment Plan Update for the Clean Transportation Program

General Comments

East Bay Community Energy (EBCE) supports the California Energy Commission (CEC) approving the 2020-2023 Investment Plan Update for the Clean Transportation Program and is proud to have contributed to its development via the Advisory Committee. We are very pleased to see the inclusion of the one-time legislative appropriation for \$51M to increase and accelerate EV charging infrastructure in Fiscal Year (FY) 2020-2021. We believe this funding will be critical to helping the state get closer to closing the gap between existing electric vehicle (EV) charging stations and the amount of deployment that is needed now and in the coming years. We are looking forward to collaborating with the CEC on charging station deployment in Alameda County via the CALeVIP program in 2021.

With this being a multi-year Investment Plan Update, and understanding that there will be annual updates to the Plan moving forward, the remainder of EBCE's comments reflect what we encourage the CEC to consider during future update processes.

Table ES-3: Investment Plan Allocations for FY 2020-2021 and Subsequent Fiscal Years (in Millions) – p. 9

- Light-Duty Electric Vehicle Charging Infrastructure and e-Mobility:

While EBCE supports the CEC's near-term prioritization of funding for light-duty EV charging infrastructure and appreciates the inclusion of the \$51M appropriation, we do have concerns about the dramatic decrease and elimination of funding for this category in the later years of the Plan (FY 2022-2023: \$10M, FY 2023: \$0). The Plan notes that despite the number of existing charging stations and the funding allocated toward deploying charging stations, the state will still have a significant gap from achieving its goal of 250,000 charging stations being deployed by 2025. Therefore, we strongly encourage the CEC to increase the funding allocated to this category in FY 2022-2023 and FY 2023. Additionally, we believe it will be critically important for the CEC to act on the updated assessment of the infrastructure needed to support the level of EV adoption mandated by Gov. Newsom's Executive Order B-48-18.

EBCE appreciates that the near-term funding allocation for this category is intended to fund shovel-ready projects that promote job creation and economic activity, ensuring EV adoption is not stymied by lack of infrastructure. With this significant amount of money going to shovel-ready projects, it will be critical that the investor owned utilities (IOUs) are prepared for these projects and that the electrical grid is upgraded to be capable of supporting these projects. We strongly encourage the CEC to work with the IOUs to ensure the grid upgrade and interconnection processes are not a barrier to these shovel-ready projects.

- Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure:

EBCE supports the CEC's focus on medium- and heavy-duty (MD/HD) vehicle and infrastructure funding in the later years of the Plan. That said, we do have concerns about the significant decrease in funding (~\$25M) from FY 2022-2023 to FY 2023. It is likely that these vehicles will not reach cost parity with their internal combustion engine counterparts by 2023. The higher upfront costs of acquiring these vehicles combined with the cost of acquiring and installing the necessary charging infrastructure will continue to be a barrier to adoption into these later years of the Plan. We strongly encourage the CEC in the coming Plan updates to consider higher investment amounts in MD/HD vehicle and infrastructure funding category in FY 2023.

- Zero- and Near Zero-Carbon Fuel Production and Supply:

Currently this funding category does not include funding for the production and supply of electricity, or even renewable electricity, as a zero- or near zero-carbon fuel. EBCE strongly encourages the CEC to consider including electricity, or at least renewable electricity, in this funding category in the coming years of the Plan. This could include funding for on-site renewable electricity production supplied to EV charging stations, as well as battery energy storage projects that reduce demand charge impacts and increase resiliency for EV charging.

- Recovery and Reinvestment:

EBCE appreciates the CEC's efforts to adapt the Plan in light of the health and economic impacts that COVID-19 has had on California's residents and businesses. We understand that CEC staff had limited time to make this adjustment to the Plan, and we commend their efforts to do so. That said, we encourage the CEC to reassess this funding category

during the next Plan update process, as we expect the economic impacts of COVID-19 to continue to affect residents and businesses beyond FY 2020-2021. We believe it will be very beneficial for this funding to continue to some extent in FY 2021-2022. We would also support this being accomplished in the form of increasing funding in subsequent years for the Workforce Training and Development category and focusing that funding on benefiting residents and businesses impacted by COVID-19. We are of course willing to work with CEC staff to understand the impacts this crisis is having on the residents and businesses in our service area.