

**DOCKETED**

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*Comment Received From: Dan Bowerson  
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**Auto Innovators Comments on CEC 2021-2023 Clean  
Transportation Program Investment Plan**

Please find the attached comments from the Alliance for Automotive Innovation on CEC's 2021-2023 Clean Transportation Program Investment Plan, Docket 21-ALT-01.

*Additional submitted attachment is included below.*



May 14, 2021

Hon. Patricia Monahan  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

**Re: Docket No. 21-ALT-01, Comments of the Alliance for Automotive Innovation on the CEC 2021-2023 Investment Plan Update for the Clean Transportation Program**

Dear Commissioner Monahan:

The Alliance for Automotive Innovation (“Auto Innovators”)<sup>1</sup> thanks the California Energy Commission (“CEC”) for the opportunity to provide comments on the 2021-2023 Investment Plan Update for the Clean Transportation Program (“Plan”).

Auto Innovators represents automakers that collectively produce over 99 percent of the new cars and light trucks sold in the United States, tier one original equipment suppliers, and technology and other automotive companies. Auto Innovators is committed to advocating for and implementing policies and programs that support transportation electrification, including battery electric, plug-in hybrid, and hydrogen fuel cell technologies.

Automakers have invested tens of billions of dollars over the last ten years in every facet of electric vehicle (“EV”) technology – from batteries to fuel cell stack design and production, electric motors to battery cell controllers, different vehicle types and capabilities, and more. Our industry’s investment in vehicle electrification is estimated to reach over \$250 billion globally by 2025.<sup>2</sup> Due to

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<sup>1</sup> Formed in 2020, the Alliance for Automotive Innovation is the singular, authoritative, and respected voice of the automotive industry. Focused on creating a safe and transformative path for sustainable industry growth, the Alliance for Automotive Innovation represents the manufacturers producing nearly 99 percent of cars and light trucks sold in the U.S. The newly established organization, a combination of the Association of Global Automakers and the Alliance of Automobile Manufacturers, is directly involved in regulatory and policy matters impacting the light-duty vehicle market across the country.

<sup>2</sup> AlixPartners. “Betting Big in Electrification and Autonomous.” *Global Automotive Outlook 2018 – EMEA Release* (June 2018). [https://iwk-cp.com/wp-content/uploads/2018/07/Automotive-Global-Outlook-2018-European-version\\_IWK\\_FINAL.pdf](https://iwk-cp.com/wp-content/uploads/2018/07/Automotive-Global-Outlook-2018-European-version_IWK_FINAL.pdf).

this massive industry investment, around 130 EV models are expected by 2025, with more options to meet a wider variety of customer needs. However, automotive industry investments alone are not enough to ensure increased market penetration for EVs. Increasing customer demand for EVs is necessary, and time and time again studies have shown that purchase incentives and available charging/refueling infrastructure are key.

We applaud the CEC for the nearly \$1 billion investment in projects supporting the use of alternative fuel and advanced vehicle technologies. This has led to California becoming a global leader in transportation electrification. We also appreciate the plan's continued investment in hydrogen refueling stations, which will be necessary to meet California's goal of 200 hydrogen stations by 2025.<sup>3</sup>

Regrettably, the Plan takes a step in the wrong direction for light-duty EV charging infrastructure. Counter to California's goals, the Plan significantly reduces the investment in light-duty EV charging for FY 2022-2023 from \$30.2 million to \$10.0 million and eliminates funding for the segment in FY 2023-2024. In the Plan, staff correctly states that "the sum of existing and expected future charging ports will not be enough to meet the state's goal of 250,000 chargers and 10,000 DC fast chargers by 2025."<sup>4</sup> With this recognition of the immense challenge to meet the state's target, it is counter-productive for the state to reduce funding at this stage. In addition to the goal of 250,000 chargers by 2025, CEC's AB 2127 report estimates that California will need 1.5 million public chargers by 2030<sup>5</sup> to meet its goal of 100 percent zero emission vehicle ("ZEV") sales by 2035.<sup>6</sup> The reduction in investment proposed in the Plan will drastically hinder California's ability to meet its ambitious targets.

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<sup>3</sup> Executive Order B-48-18.

<sup>4</sup> California Energy Commission 2021-2023 Investment Plan Update for the Clean Transportation Program, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=237549&DocumentContentId=70758>

<sup>5</sup> California Energy Commission Assembly Bill 2127 Electric Vehicle Charging Infrastructure Assessment, [Assembly Bill 2127 Electric Vehicle Charging Infrastructure Assessment - Analyzing Charging Needs to Support Zero-Emission Vehicles in 2030 \(Staff Report\)](#)

<sup>6</sup> Executive Order N-79-20, <https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-text.pdf>

Auto Innovators appreciates the opportunity to provide these comments and looks forward to working with CEC and the state of California to meet upcoming targets. As CEC staff rightly states, “[t]he expansion of ZEVs will depend on the availability of fueling infrastructure that meets consumers’ needs and expectations.”<sup>7</sup> We commend CEC for the investment in critical infrastructure to date and are optimistic that CEC will fund light-duty vehicle infrastructure at the level of investment needed to meet consumers’ needs and expectations, as well as the state’s goals.

Respectfully submitted,



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<sup>7</sup> California Energy Commission 2021-2023 Investment Plan Update for the Clean Transportation Program, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=237549&DocumentContentId=70758>