

**DOCKETED**

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

*Additional submitted attachment is included below.*



May 14, 2021

RE: 2021-2023 Investment Plan Update for the Clean Transportation Program

### General Comments

East Bay Community Energy (EBCE) is proud to have contributed to the development of the Investment Plan for the Clean Transportation Program via the Advisory Committee. We believe the funding in this plan 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 late-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-2: Investment Plan Allocations for FY 2021-2022 and Subsequent Fiscal Years (in Millions) – p. 10

- 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, 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 2023-2024: \$0). There is actually more funding allocated in the plan for Public Hydrogen Fueling Infrastructure (\$50M) than there is for light-duty EV charging infrastructure (\$40.2M), despite the gap in EV charging infrastructure being much more significant than the gap in hydrogen fueling infrastructure. Additionally, the same amount of funding is allocated toward Alternative Fuel Production and Supply in 2022-2023 (\$10M) and more in 2023-2024 (\$5M) than there is for light-duty EV charging infrastructure.

Meanwhile the demand for light-duty EV charging infrastructure, and incentives to help with deployment, have never been higher. For example, the CALeVIP program is thus far oversubscribed by more than \$250M, and we know this number will only grow as more

projects are rolled out across the state. The state's EV charging infrastructure network is lagging behind current EV adoption, and is lagging behind the state's goals. This is not so much the case for hydrogen fueling infrastructure, and yet the plan disproportionately funds these two categories. And given the Governor's Executive Order pushing the state's transportation system toward 100% zero-emission, we have concerns about the disproportionate funding in the plan being allocated toward Alternative Fuel Production and Supply, which includes near-zero-emission fuels.

Regarding the funding allocated to Light-Duty Electric Vehicle Charging Infrastructure and e-Mobility, the SB 1000 EV Infrastructure Deployment Assessment found that there are fewer chargers within high population density areas. We believe that for the state to achieve its goals, it will be critical to increase access to publicly available fast charging in high population density areas. This will increase access to charging infrastructure for renters in multi-unit dwellings who cannot install home charging and will increase access for high-mileage drivers on transportation network company platforms. This is important from not only a climate perspective, but also from an equity perspective.

- 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 plan. That said, we do have concerns about the significant decrease in funding (~\$25M) from FY 2022-2023 to FY 2023-2024. 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.