

**DOCKETED**

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*Comment Received From: California Electric Transportation Coalition (CaETC)*  
*Submitted On: 9/30/2021*  
*Docket Number: 21-ALT-01*

**Support for 2021023 Revised Staff Draft Investment Plan update**

*Additional submitted attachment is included below.*



September 30, 2021

California Energy Commission  
Re: Docket No. 21-ALT-01

*Submitted via electronic commenting system for docket 21-ALT-01*

**Re: Revised Staff Draft: 2021-2023 Investment Plan Update for the Clean Transportation Program**

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments in support of the Revised Staff Draft 2021-2023 Investment Plan Update for the Clean Transportation Program. CalETC's Executive Director (Advisory Committee member Eileen Tutt) provided some verbal feedback for the revised Investment Plan on September 16, 2021. This letter is intended to largely support the direction the Revised Draft Staff Report establishes and the multi-year funding approach, as well as to provide more thorough feedback for consideration by Lead Commissioner Monahan and CEC staff.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, the Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership also includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, and other industry leaders supporting transportation electrification.

California has goals to transition to 100% light-duty zero-emission vehicles (ZEVs) and drayage trucks by 2035 and 100% on-road ZEV fleet by 2045<sup>1</sup>. The [CEC's AB 2127 report](#) and [SB 1000 reporting requirements](#) both call for accelerated deployment of charging infrastructure and indicate that while progress has been made, much more will be needed, particularly in communities of color, low income, and/or disadvantaged communities, to adequately, reliably and affordably fuel electric cars and trucks on the road today and anticipated in the next decade. The [CalETC White Paper](#) on light-duty infrastructure needs, the [CalETC Medium- and Heavy-Duty Electric Vehicle](#) forecasting report, and the [Revised Staff Report Investment Plan](#) all definitively demonstrate that California has a long way to go to meet its ZEV and charging station targets, as well as the air quality and climate change goals underpinning these targets.

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<sup>1</sup> Governor Newsom [Executive Order N-79-20](#).

CalETC supports the recommendations in Revised Staff Report Investment Plan. The Legislature and the Newsom administration demonstrated California's leadership once again with a substantial investment in zero-emission fueling infrastructure in the 2021/22 State budget. The budget and the CEC have rightly focused on the need to ensure at least 50% of these infrastructure investments benefit low-income and/or disadvantaged communities. The Commission's multi-year investment planning strategy is essential to attract manufacturing and private sector investment in California. Reliable and robust public investment is critical to generating the momentum needed for this unprecedented build out of zero-emission fueling infrastructure in the next three years and decade. To further secure our zero-emission transportation future, CalETC looks forward to working with the administration and the Legislature in 2022 to ensure reauthorization of the Clean Transportation Program and provide certainty in the market beyond the 2021/22 State budget general fund allocation.

CalETC supports the general fund investments outlined in the proposed 2021/22 State budget and the electric vehicle (EV) targets supported by these investments including 1,125 drayage trucks, 1,000 school buses, and 1,000 transit buses. We support the investments in ZEVs at CARB and ZEV infrastructure at CEC. These investments will continue attracting manufacturing to California and ensure the cars and trucks on the road have access to the fueling infrastructure they need to maximize zero-emission miles driven. Transitioning the truck market to ZEV will be significant challenge and ensuring a robust fueling infrastructure is key to overcoming this challenge. Medium- and heavy-duty zero-emission trucks will require higher-power charging stations and the charging infrastructure must be in place before the trucks are delivered for use so that zero-emission trucks will be able to operate and support the livelihoods of those dependent upon them. Investment in building out the infrastructure to support zero-emission trucks is critical today to ensure that tomorrow's zero-emission trucks can operate fully.

CalETC supports the investments in light-duty charging infrastructure; particularly those focused on shared access, multi-unit dwellings, e-mobility, and other equity-related investments that act to expand EV access to all Californians. Light-duty investments facilitate the needed investments in medium- and heavy-duty vehicles and infrastructure, through technology transfer. CalETC strongly opposes any suggestion that there is an inherent choice between light-duty and medium- and heavy-duty charging infrastructure investments – both are necessary. We suggest prioritizing equity and zero-emission technologies in California's investment strategy. In this way, California can again lead in demonstrating to other states and the world that there is a need to provide public investments until the market can sustain itself.

Investments should include charging infrastructure for shared access vehicles, including transportation network companies and e-mobility, as these cars typically drive many more miles than non-shared vehicles and act to increase both mobility and jobs in communities. Access to charging infrastructure specific to shared use vehicles will increase zero-emission miles driven and benefit all drivers who need to access public charging by making this infrastructure more available and accessible.

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Continued investment in light-, medium- and heavy-duty zero-emission technologies is essential at this point in ZEV market development. California is not meeting the infrastructure needs for the light, medium, and heavy-duty vehicles on the road today and is far behind where it will need to be to support 100% zero-emission mobility and transportation options. Although the 3-year investment plan and the state's clear demonstration of support with the 2021/22 budget allocation is a very strong start toward addressing this deficit, there is still no clear roadmap to ensure the needed infrastructure for these vehicles (light-, medium-, or heavy-duty) will be in place in the next decade.

CalETC supports the proposed investments in ZEV manufacturing and workforce training and development. Previous Clean Transportation Program investments in ZEV manufacturing have been essential to creating and retaining good jobs in the industry, and more is needed. We do not comment at this time on whether the recommended investment is adequate but we are committed to working with staff and other Advisory Committee members to better understand the need and whether the proposed "alternating year" approach to this allocation is sufficient and workable to support and accelerate ZEV manufacturing and workforce training and development in the state.

Thank you for your consideration of our comments. Please do not hesitate to contact me at (916) 551-1943 or [eileen@caletc.com](mailto:eileen@caletc.com) should you have any questions.

Sincerely,



Eileen Wenger Tutt, Executive Director  
California Electric Transportation Coalition