

DOCKETED

Docket Number:	21-ALT-01
Project Title:	2021-2022 Investment Plan Update for the Clean Transportation Program
TN #:	239917
Document Title:	California Transit Association - 2021-2023 Investment Plan Update for the Clean Transportation Program
Description:	N/A
Filer:	System
Organization:	California Transit Association
Submitter Role:	Public
Submission Date:	9/30/2021 5:19:08 PM
Docketed Date:	10/1/2021

Comment Received From: Michael Pimentel
Submitted On: 9/30/2021
Docket Number: 21-ALT-01

**California Transit Association - 2021-2023 Investment Plan Update
for the Clean Transportation Program**

Additional submitted attachment is included below.

September 30, 2021

California Energy Commission
Docket No. 21-ALT-01
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission:

On behalf of the California Transit Association, I write to you today in response to the release of the **2021-2023 Investment Plan Update for the Clean Transportation Program (Revised Staff Report)**. The Plan advances a multi-year funding program for medium- and heavy-duty infrastructure – supported by the significant new investment of General Fund revenues – that would provide fleet owners, like the transit agencies we represent, with much-needed certainty on the availability of vital infrastructure funding as they transition to zero-emission buses. As a statewide association representing more than 85 transit agencies in state, we greatly appreciate your continued attention to our industry’s funding priorities and your clearly articulated commitment to assisting transit agencies in their transition to zero-emission buses, regardless of the fuel path they choose.

The comments that follow lend greater specificity to the feedback we provided to you at the Advisory Committee meeting on September 16, 2021.

Proposed Funding Level and Schedule

As drafted, the Plan proposes to invest \$88.5 million in “transit” and \$264 million in “medium- and heavy-duty zero-emission vehicles and infrastructure” between Fiscal Years 2021-22 and FY 2023-24. We understand fully that, as the Plan is finalized and adopted by the Commission later this year, CEC staff will work with stakeholders – as it has done in previous years – to suballocate funding approved for “medium- and heavy-duty zero-emission vehicles and infrastructure” to various programs and projects. Several of these programs and projects may support the buildout of charging and refueling infrastructure by California’s transit agencies, augmenting the \$88.5 million specifically earmarked for these purposes by the Newsom Administration and California State Legislature in the FY 2021-22 State Budget and reflected in the Plan.

With that said, this year is truly extraordinary, with \$190 million of the \$264 million for “medium and heavy-duty zero-emission vehicles and infrastructure” coming from the General

Fund, nearly doubling in Fiscal Year 2021-22 the annual funding CEC has historically had available for all its infrastructure programs across the light-, medium- and heavy-duty sectors. As such, we believe it is imperative that CEC identify how this funding will be used prior to the Plan's adoption, so that stakeholders can inform the CEC's investment strategy. Without such early action, it is nearly impossible for us, or any stakeholder, to provide the CEC with an informed perspective on whether the Plan strikes the right balance of investments across sectors.

As we make this request, we advocate that the CEC use this process of early action to at least double the funding available to transit agencies to support the buildout of charging and refueling infrastructure. Still additional funding could be provided to support the transition to zero-emission buses by transit agencies through the redirection of some level of funding identified for charging and refueling infrastructure for light-duty vehicles. This shift would be predicated on the reality that zero-emission buses more directly support disadvantaged communities whose residents are less likely to own a personal vehicle and would further support the reduction of PM 2.5 from heavy-duty vehicles. Much of this funding should be front-loaded, given the budget capacity identified for the FY 2021-22, and to allow transit agencies to take advantage of key provisions in the California Air Resources Board's Innovative Clean Transit (ICT) regulation, which credits the early deployment of zero-emission buses.

Proposed Eligible Uses and Funding Structure

The Plan proposes to provide funding to transit agencies to support their transition to zero-emission buses and ultimately full implementation of the ICT regulation. This funding is critical and will help transit agencies further leverage funding for zero-emission buses and infrastructure, expected to be approved by Congress later this fall.

As we have communicated in previous years, we continue to support directing this funding to the following programs and projects:

- **Zero-Emission Transit Fleet Infrastructure Deployment Program:** This program funds a [wide array of project costs associated with electric vehicle charging or hydrogen refueling infrastructure](#) needed to support the large-scale conversion of transit bus fleets to zero-emission vehicles. We encourage the CEC to expand the list of eligible project costs to include additional infrastructure components, including but not limited to: the relocation and site setup costs for temporary depots needed while existing depots are upgraded for zero-emission infrastructure; wireless inductive electrical vehicle charging infrastructure; and IT infrastructure necessary to support zero-emission infrastructure including fiber optic cabling, ethernet cabling, patch panels, conduit, network switches, routers, firewalls, security scanning and compliance software, server technology, data storage technology, server operating system software, application software, and reporting software.
- **Blueprints for Medium- and Heavy-Duty Zero-Emission Vehicle Infrastructure Program:** This program funds [planning "blueprints"](#) that will identify actions and

milestones needed for implementation of medium- and heavy-duty electric charging or hydrogen refueling infrastructure. We encourage the CEC to create a dedicated funding set-aside within this program for transit agencies, given the impending enforceable ZEB purchase requirements of the ICT regulation (set to begin as soon as 2023) and in recognition of pending federal legislation, which will limit access to zero-emission bus grants to transit agencies that have developed fleet transition plans.

Finally, as the CEC continues to grow into its role of the state's primary funder of zero-emission infrastructure, we strongly encourage you to continue to refine the process of applying for funding, particularly for transit agencies and small fleet owners that may not have the staff resources to navigate the current grant solicitation process. We applaud your efforts to establish a first-come/first-serve block grant program, through the [Energize Commercial Vehicles project](#), and look forward to engaging you on its programmatic structure and guidelines.

In closing, we appreciate the opportunity register these comments and for our seat on the Advisory Committee for the Clean Transportation Program. We look forward to continuing to engage with you, your staff and your partner agencies, to further the state's goals of widespread transportation electrification.

Please feel free to contact me at 916- 446-4656 x1034, if you have any questions about the recommendations provided in this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Pimentel". The signature is fluid and cursive, with a large initial "M" and "P".

Michael Pimentel
Executive Director