

**DOCKETED**

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

*Additional submitted attachment is included below.*



October 4, 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.

### Combined CTP and General Fund Allocations in Revised Staff Draft

- Light-Duty Electric Vehicle Charging Infrastructure and eMobility:

EBCE supports the CEC's updated increase in near-term prioritization of funding (\$288.1M) for light-duty EV charging infrastructure and the updated increase in funding allocated to this category in the later years of the plan (FY 2022-2023: \$30.1M; FY 2023-2024: \$13.8M). A potential concern with this funding being so frontloaded, however, is that it may be difficult for smaller organizations to take advantage of so much funding within one year. Many small organizations, and many government agencies, do not have the bandwidth to pursue several funding opportunities over short periods of time. EBCE encourages the CEC to take this into consideration when developing funding opportunities as a way of distributing the \$288.1M allocated to this category in 2021-2022.

Regarding the funding allocated to Light-Duty Electric Vehicle Charging Infrastructure and eMobility, 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, particularly the updated increase in near-term prioritization of funding (\$373.35M) and the updated increase in funding allocated to this category in the later years of the plan (FY 2022-2023: \$160.1M; FY 2023-2024: \$138.8M).

- Workforce Training and Development:

EBCE encourages the CEC to allocate more funds in the Investment Plan toward Workforce Training and Development (\$5M in each fiscal year), perhaps by shifting some of the funds currently being allocated toward Manufacturing (FY 2021-2022: \$118.75M; FY 2022-2023: \$125M). While Manufacturing funds will be critical, we have also heard from many stakeholders, particularly in the medium- and heavy-duty sector, that a lot of support is needed in Workforce Training and Development. Fleets are already in need of more qualified drivers, and will be in need of qualified technicians for maintenance work on both vehicles and charging infrastructure as fleets are electrified. Otherwise, we encourage the CEC to coordinate with other funding agencies so that other Workforce Training and Development funding opportunities can be stacked with those funded via this Investment Plan.