

**DOCKETED**

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**CalETC's Comments on ZIP Workshop**

*Additional submitted attachment is included below.*



February 2, 2022

California Energy Commission  
Re: Docket No. 21-TRAN-03

*Submitted via electronic commenting system for docket 21-TRAN-03*

**Re: ZEV Infrastructure Plan Workshop**

The California Electric Transportation Coalition (CalETC) appreciates this opportunity to support the ZEV Infrastructure Plan (ZIP) development process. Large scale infrastructure deployment is essential to meeting the state's goals and support the growing market of light-, medium-, and heavy-duty ZEVs.

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, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, autonomous electric vehicle fleet operators, and other industry leaders supporting transportation electrification.

CalETC supports the CEC's efforts to bring together all the actions being taken on infrastructure into one planning document. We believe the ZIP can serve as a "one-stop shop" for stakeholders to find programs and initiatives that will provide the resources needed to build charging and refueling infrastructure. The ZIP may also help expose duplicative programs or initiatives that can be streamlined or combined. We encourage the CEC to include in the ZIP any Air Quality Management District programs and public-private partnerships, like the EV Infrastructure Strike Force.<sup>1</sup> Including these programs will help give stakeholders a clearer picture of all the actions being taken around the state.

CalETC strongly supports the ZIP's principles of increasing equity, accelerating market development, and transitioning the market to the private sector. We recommend the ZIP define what steps and actions will be taken to achieve these principles. For example, increasing equity is a large and complex goal that the CEC is addressing in many, if not all, of its programs. However, it is important to define which equity communities are being focused on in each program and what the desired outcome is for that particular community. We recommend the ZIP include the following equity communities and explain the current programs to improve infrastructure in these areas:

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<sup>1</sup> More information on the EV Infrastructure Strike Force can be found here:  
[https://etcommunity.org/strike\\_force.html](https://etcommunity.org/strike_force.html).

- Low-income and disadvantaged communities
- Rural communities
- Tribal governments
- Local governments within low-income, disadvantaged, or rural communities
- Multi-unit dwellings
- Rideshare electrification

While the ZIP might not be the document that specifically defines the stated principles, like equity and market acceleration, we recommend the ZIP describe what actions are being taken and will be taken to define and achieve the principles.

CalETC recommends the ZEV Infrastructure Plan include a section on utility-side infrastructure deployment. Utilities use an integrated resource planning process to provide their customers and community with a reliable and sustainable power supply. Utilities use this planning process to analyze and acquire greenhouse gas emission reducing technology, including renewables, batteries, and hydroelectric. Utilities are investing in distributed energy resources to make the grid more reliable, and in turn, ensure EVs have reliable fuel. We also recommend that the ZEV Infrastructure Plan encourage early, transparent, and frequent communication between the utility and the party building charging infrastructure, because this is essential to a successful and timely electrification process.

Thank you for your consideration and CalETC looks forward to working with the CEC staff and Commissioners on infrastructure deployment.

Regards,



Kristian Corby, Deputy Executive Director  
California Electric Transportation Coalition