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*Comment Received From: Mark Rawson
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CMC Comments on Clean Transportation Investment Plan

See attached letter.

Additional submitted attachment is included below.



April 29, 2022

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

RE: FY 2022-2023 California Energy Commission (CEC) Investment Plan Update for the Clean Transportation Program

Dear CEC Commissioners and Staff,

The California Mobility Center (CMC) appreciates the opportunity to comment on the CEC's proposed FY 2022-23 Clean Transportation Program Investment Plan and supports the proposed investments to support the deployment of light-, medium-, and heavy-duty zero-emission vehicle infrastructure, as well as manufacturing.

The CMC is a non-profit founded by Sacramento Municipal Utility District (SMUD), along with partners including UC Davis, Sacramento State, community colleges, and many others, with the goal of orchestrating commercially meaningful interactions between future mobility early-stage companies and industry leading members, including driving workforce development. The CMC helps future mobility early-stage companies at all phases of the innovation-to-commercialization lifecycle to rapidly progress from demonstration projects to sustained market viability, which will help grow jobs throughout California and beyond.

The CMC appreciates the historic levels of proposed investments included within the Clean Transportation Program Investment Plan. Specifically, the CMC supports the proposed investment for zero-emission medium- and heavy-duty infrastructure, light-duty infrastructure, in-state manufacturing, and workforce development.

Within this funding, the CMC supports inclusion of funding for efforts to research and develop charging infrastructure needs, barriers, and gaps, as well as mobility options and equity. We respectfully request the CEC consider the following ideas for competitive solicitations:

- *Blueprint Charging Infrastructure Programs:* The CMC strongly supports the proposed continued funding for MD/HD Blueprint Planning Documents. The CMC respectfully requests to also include funding for light-duty blueprint planning documents, as identifying optimal charging locations for usage, available energy, and space constraints continues to be challenging for cities and municipalities. There is a need to develop a cross-section, action-oriented partnership that creates a general blueprint for a variety of use-cases including: workplace charging, public charging, multi-family charging, and more. These blueprints will





be able to be rapidly replicated across California and help accelerate the deployment of purpose-built charging infrastructure.

- *EV4Sight Initiative*: Electric vehicles will be the primary driver of electricity growth in the coming decades, as well as the pathway to a low-carbon future. Electric vehicle growth will vary by geography, even down to a neighborhood level; however, existing load growth forecasts have been based on widely varying estimates, often extrapolating from local policy goals instead of relevant local data. There is a need to aggregate and analyze public and proprietary electric vehicle-related data to uncover critical electric vehicle charging forecasts and insights for communities across California. This will generate critical centralized analysis of the many factors affecting electric vehicle adoption and charging behaviors today and into the future, and help California reduce the risk of forecasting errors and facilitate the mobility ecosystem and collaboration through a robust single version of data.
- *Equity in Electric Transportation*: CMC strongly supports the CEC’s commitment to equity for FY 2022-23 Clean Transportation Program Funding Plan. There is need to conduct direct outreach to low-income and disadvantaged communities to identify their key needs and then help design and test electric transportation program options that meet the core mobility wants and needs of low-income consumers, while advancing state and utility objectives.

Additionally, a significant barrier to successful market entry for zero-emission vehicle, equipment, and infrastructure manufacturers continues to be crossing the “valley of death” from prototype to commercially ready products. Continued assistance to early-stage mobility companies scaling from prototype to pre-series production is strongly encouraged, particularly for those companies seeking to manufacturer in California where labor, facility and related operating costs are higher than elsewhere. To that end, the CMC encourages the CEC to expand eligibility for its scale-up and manufacturing related solicitations to allow non-profits such as the CMC who provided ‘manufacturing as a service’ to many early-stage companies versus a select few, thereby dramatically increasing the leverage and utilization of CEC invested dollars.

The CMC greatly appreciates the opportunity to provide input on and support for the FY 2022-23 Investment Plan for the Clean Transportation Program. We thank staff for the focus on medium and heavy-duty infrastructure incentives and look forward to working with the Commission as the plan is implemented.

Sincerely,

A handwritten signature in blue ink that reads "Mark Rawson". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Mark Rawson
Chief Operating Officer

