

DOCKETED

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**EBCE's Comments on the Clean Transportation Program's 2022 -
2023 Investment Plan Update**

Additional submitted attachment is included below.



April 29, 2022

RE: The Clean Transportation Program's 2022-2023 Investment Plan Update

General Comments

East Bay Community Energy (EBCE) is proud to continue contributing 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 also proud to have collaborated with the CEC on launching Alameda County's CALeVIP program in late-2021.

EBCE appreciates the CEC's increased focus on providing charging infrastructure for multi-family residents, and the inclusion of these residents in the Plan's language around equity. Nearly half of the residents in EBCE's service area are renters, who will face many barriers to charging their EVs where they live. Until these residents throughout California have convenient and reliable access to charging infrastructure, they will be hesitant to adopt EVs, which will keep the state from achieving its goals. We continue to encourage the CEC to focus investments on projects that will increase access to publicly available fast chargers in areas densely populated by renters, such as the REACH grant program aims to do.

The following comments reflect what EBCE encourages the CEC to consider during this final full fiscal year plan update process.

Proposed CTP and General Fund Allocations

- Light-Duty Electric Vehicle Charging Infrastructure and eMobility:

EBCE was discouraged to see that there are no proposed general funds allocated to light-duty EV charging infrastructure. That said, we understand the Governor's proposed 2022-2023 budget would allocate \$900M for light-duty EV charging infrastructure. Given that this budget is yet to be confirmed, we would strongly encourage the CEC to shift general fund allocations toward light-duty EV charging infrastructure if there happens to be a significant reduction of this allocation in the Governor's proposed budget. Funding for this category in the plan will be critical given the AB 2127 report identified a gap of

nearly 900,000 light-duty EV chargers needed by 2030. We encourage the CEC to aim the funding within this plan (including funds from the Governor's budget) to start closing this gap now.

- 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. Given that the AB 2127 report identified a gap of more than 150,000 medium- and heavy-duty chargers needed by 2030, we encourage the CEC to focus a significant portion of these allocated funds toward charging infrastructure. More specifically, we encourage the CEC to use these funds to increase access to medium- and heavy-duty charging stations beyond just port boundaries. According to DMV registration data, nearly all medium- and heavy-duty trucks domicile outside of the port, and many are located well beyond port boundaries, and will therefore rely on charging infrastructure in other locations in order to complete their daily routes. EBCE is currently utilizing CEC grant funds to develop a medium- and heavy-duty blueprint for our service area, which includes identifying target locations for charging infrastructure deployment beyond the port. We look forward to sharing this information with the CEC.

Additionally, EBCE encourages to CEC to utilize these funds to help independent truck owner operators acquire electric trucks. The majority of trucks registered in our service area are owned by these individuals, who will not have the same capability of acquiring new electric trucks at their current price points as larger companies will. This of course presents a significant equity issue. These individuals also will likely not have the capacity to apply for and manage grant funds to procure these trucks. Simple incentive programs and innovative financing mechanisms will be necessary to get these drivers into electric trucks in the timeframe necessary to achieve the state's goals.

- Hydrogen Fueling Infrastructure:

EBCE encourages the CEC to focus these funding allocations on increasing and lowering the cost of green hydrogen production. The cost of hydrogen will of course play a critical role in the adoption of fuel cell EVs but incentivizing the production of hydrogen using natural gas would be in contradiction to the state's climate goals. Therefore, it will be critical that the cost of producing green hydrogen becomes more cost-effective in the near-term.

- ZEV Manufacturing:

To the extent possible, EBCE encourages the CEC to ensure that these funds (\$135M) being allocated toward ZEV manufacturing are directly correlated with reducing the cost of EVs for consumers. This is important for light-duty EVs, as the state will not reach its goals until low- and moderate-income residents feel they can procure EVs. This not only means making EVs more affordable but will likely require that they are cheaper than their gasoline alternatives. This will also be particularly important for medium- and heavy-duty EVs, based on our comments about independent owner operators in the Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure section.

- Workforce Training and Development:

EBCE encourages the CEC to allocate more funds in the Investment Plan toward Workforce Training and Development. Through outreach conducted via our medium- and heavy-duty blueprint grant scope of work, we have 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 also 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.