DOCKETED	
Docket Number:	22-ALT-01
Project Title:	2022-2023 Investment Plan Update for the Clean Transportation Program
TN #:	242902
Document Title:	California Electric Transportation Coalition (CalETC) and Electr Comments - Support for Staff Draft Investment Plan
Description:	N/A
Filer:	System
Organization:	California Electric Transportation Coalition (CalETC) and Electr
Submitter Role:	Public
Submission Date:	4/29/2022 4:06:39 PM
Docketed Date:	4/29/2022

Comment Received From: California Electric Transportation Coalition (CalETC) and Electr
Submitted On: 4/29/2022
Docket Number: 22-ALT-01

Support for Staff Draft Investment Plan

Additional submitted attachment is included below.

April 29, 2022

California Energy Commission
Re: Docket No. 22-ALT-01

Submitted via electronic commenting system for docket 22-ALT-01

Re: Staff Draft: 2022-2023 Investment Plan Update for the Clean Transportation Program

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments in support of the Staff Draft 2022-2023 Investment Plan Update for the Clean Transportation Program. CalETC's Executive Director (Advisory Committee member Eileen Tutt) provided some verbal feedback for the Investment Plan on April 12, 2022. This letter is intended to largely support the direction the Draft Staff Report establishes, as well as to provide more thorough feedback for consideration by Lead Commissioner Monahan and CEC staff.

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, the Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership also includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, and other industry leaders supporting transportation electrification. The positions in this letter are not intended to represent all the CalETC members.

California has goals to transition to 100% light-duty zero-emission vehicles (ZEVs) and drayage trucks by 2035 and 100% on-road ZEV fleet by 2045.[1] The CEC's AB 2127 report and SB 1000 reporting requirements both call for accelerated deployment of charging infrastructure and indicate that while progress has been made, much more will be needed, particularly in communities of color, low-income, and/or disadvantaged communities, to adequately, reliably and affordably fuel electric cars and trucks on the road today and anticipated in the next decade. The CalETC White Paper on light-duty infrastructure needs, the CalETC Medium- and Heavy-Duty Electric Vehicle forecasting report, and the Draft Staff Report 2022-2023 Investment Plan Update for the Clean Transportation Program all definitively demonstrate that California has a long way to go to meet its 2030 charging station targets, as well as the air quality and climate change goals underpinning these targets.

[1] Governor Newsom Executive Order N-79-20.

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CalETC supports the recommendations in Staff Report Investment Plan. The Legislature and the Newsom administration demonstrated California's leadership with a substantial investment in zero-emission fueling infrastructure in the 2021/22 State budget. The Governor's proposed 2022/23 budget further validates the state's commitment to a full suite of policies, including investments, necessary to fully transition the on-road fleet of cars, trucks, and buses to zero-emission technologies. The CEC staff have rightly focused on the need to ensure at least 50% of these infrastructure investments benefit low-income and/or disadvantaged communities. The Commission's multi-year investment planning strategy is essential to attract manufacturing and private sector investment in California, and we strongly encourage the Legislature and Governor to act swiftly on reauthorization of the Clean Transportation Program and other programs funded by AB 8 (Perea, Chapter 401, Statutes of 2013). Reliable and robust public investment is critical to generating the momentum needed for this unprecedented build out of zero-emission fueling infrastructure in the next two years and decade.

CalETC supports the investments in light-duty charging infrastructure, including those focused on shared access, multi-unit dwellings, e-mobility, and other equity-related investments that act to expand EV access to all Californians. Light-duty investments facilitate the needed investments in medium- and heavy-duty vehicles and infrastructure, through technology transfer. CalETC strongly opposes any suggestion that there is an inherent choice between light-duty and medium- and heavy-duty charging infrastructure investments – both are necessary. We also oppose prioritizing or carving out specific funding for hydrogen fueling stations at the expense of investment in both light-duty and heavy-duty vehicle charging stations; both technology types, fuel cell and battery-electric, are needed and planning for future investment must be flexible as it is still unknown which zero-emission technology type will be most attractive to consumers or more prevalent in any given market segment.

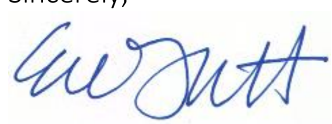
Investments should include charging infrastructure for shared-access vehicles, including transportation network companies and e-mobility, as these cars typically drive many more miles than non-shared vehicles and act to increase both mobility and jobs in communities. Access to charging infrastructure specific to shared-use vehicles will increase zero-emission miles driven and benefit all drivers who need to access public charging by improving infrastructure availability and accessibility.

CalETC supports investments in heavy-duty fueling technologies; it is essential these investments and the fueling stations be available prior to trucks being delivered to fleets and customers. Unlike light-duty electric cars (where home charging is an option in some cases), heavy-duty trucks cannot operate without access to charging infrastructure in advance of their delivery. The same applies to hydrogen-fueled trucks. Therefore, the funding for truck refueling options needs to best reflect the state of technology and consumer acceptance and cannot be predetermined or contain set asides that may result in stranded investment of public dollars. The draft staff report rightly recognizes that there are substantial private investments by the oil and gas industries in hydrogen refueling, which suggests that the market is supporting both charging and hydrogen fueling stations and specific set asides are unnecessary, limit flexibility, and increase risk. Battery-electric cars and trucks are more prevalent, but still in the very early market stages, with an increasingly diverse portfolio of options, and the market cannot grow without substantial investment in charging infrastructure. Therefore, the public investment will need to consider the market that exists and is anticipated in the future without predetermining a market that does not currently exist. This is a challenge that will require ongoing flexibility for regulators as they allocate funding.

CalETC supports the proposed investments in ZEV manufacturing and workforce training and development. Previous Clean Transportation Program investments in ZEV manufacturing have been essential to creating and retaining good jobs in the industry, and more is needed. We do not comment at this time on whether the recommended investment is adequate, but we are committed to working with the Lead Commissioner, CEC staff, and other Advisory Committee members to better understand the need and ensure it is adequate to overcome the inherent inequities in jobs creation that have existed for centuries.

Thank you for your consideration of our comments. Please do not hesitate to contact me eileen@caletc.com should you have any questions.

Sincerely,



Eileen Wenger Tutt, Executive Director
California Electric Transportation Coalition