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City of Santa Monica Comments

Additional submitted attachment is included below.



May 11, 2022

Submitted Electronically

California Energy Commission
Docket Log (21-TRAN-03)
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: Comments on the Draft Zero-Emission Vehicle Infrastructure Plan (ZIP)

Dear Energy Commission staff,

The City of Santa Monica applauds the State's leadership for the acceleration of zero-emission vehicle (ZEV) adoption. To maximize the impact of the ZIP and future CEC investments, we strongly urge you to consider the unique needs of the fleets of local public agencies. Programs like CALeVIP were an important start, but direct funding for public fleet infrastructure is a key missing opportunity in the state's strategy. Advancing direct formula funding to public fleets can accelerate turn-key electrification that will significantly improve the air quality of our most disadvantaged neighborhoods.

This request builds on our leadership in ZEV adoption and innovation. Examples include:

- Adoption of an EV Action Plan in 2017
- Our adoption of a City Administrative Instruction requiring the procurement of alternatively fueled vehicles (primarily EV) for light-duty fleet vehicles;
- Our use of City funds to install over 150 EV chargers across City facilities;
- Partnership with EVgo for public DC fast charging in City parking lots;
- Our support for community chargers through participation in the Southern California Edison Charge Ready program; and
- Our adoption of a local EV Charger Reach Code to increase required EV charging infrastructure for all new construction.

However, **our ability to further accelerate the electrification of our own fleet is constrained**. We need forward-thinking investment for longer-term infrastructure upgrades to support fleet conversions over time.

We are committed to fleet electrification, with over 100 EVs in our City fleet, 18 battery electric transit buses, and plans to have a fully electric bus fleet by 2030. The absence of dedicated funding for public fleet charging infrastructure is a barrier for continued EV fleet expansion.

We urge you to address the **unique charging needs of public fleets, which are notably absent from the ZIP**.

Local agencies are critical partners for the rapid electrification of California's vehicle fleet. While our agencies typically have existing funding mechanisms to support vehicle replacement, **our traditional local agency financial budgeting processes are not structured to cover the large upfront costs that will be necessary for the long-term expansion of electrical**

capacity and charging infrastructure that's necessary for our fleets to convert to zero-emission.

Agencies like ours require greater state support to cover upfront ZEV infrastructure investments. Such a coordinated approach could also ensure successful compliance of public agencies with the proposed Advanced Clean Fleets Regulation.

We strongly advocate for direct, formula funding to local public fleets that are committed to electrification. Please find additional detail and context below, based on the issues and opportunities identified in the ZIP.

I. Reliability of charging and infrastructure networks:

In addition to the issues identified in the ZIP, the CEC should also address the reliability of infrastructure for the unique needs of agencies providing critical services. As a full-service municipality, conversion of our fleet requires investment in additional fleet-only chargers at dedicated corporation yards to ensure continuity of critical services. To address the importance of reliability of public services, the CEC should increase funding to local agency fleets for infrastructure, which may involve investment in infrastructure placed in City yards with restricted access to our fleets and services.

II. Equity in every decision:

Recognizing that large public fleets like ours greatly impact the air quality of historically under resourced neighborhoods, direct investment in fleet infrastructure ensures significant and rapid fleet conversion that impacts DACs. Importantly, even with massive state investments, many of our low-income communities are unable to quickly transition to ZEVs. Hence, to ensure these neighborhoods benefit from ZEV technologies, the state can facilitate the rapid electrification of public fleets to deliver air quality benefits.

III. Level 1 and Level 2 Charging for Light-Duty PEVs:

Although the ZIP proposes weighting more investment to MD/HD ZEV infrastructure, we strongly urge the CEC not to leave light-duty public fleets behind. Providing adequate light-duty charging infrastructure is critical, and until these needs are met, electrification of our medium- and heavy-duty fleet will be delayed.

III. Other Issues:

When considering light-duty vehicle chargers, please note the following as considering related ZIP issues:

- **Fast charging for light-duty plug-in EVs:** We agree that fast charging is important to support range confidence and ensure continuity of services for critical local agency operations. However, we strongly emphasize the importance of funding for fast chargers serving public fleets, which are public-serving and public-benefitting, even when only available to fleet vehicles.
- **Challenges with competitive grants:** Competitive grant programs to cover the scope of our funding needs are challenging and unpredictable, making it infeasible for local agencies to plan, prepare, and set aside necessary funding to compete for new sources. Furthermore, local agencies typically operate on a fiscal year schedule, which pose challenges for mobilizing resources for rapidly emerging programs on tight timelines.
- **Infrastructure serving public fleets should be treated as public:** Chargers supporting public fleets should be eligible for funding that targets "public" charging, regardless of whether the charger is available directly to members of the public. Again, our fleets are paid for with taxpayer and ratepayer dollars, and deliver critical public

services to the community. Our fleets are an important component of the state's continued public investment and continuity of operations.

To conclude, **we encourage you to prioritize turnkey, direct formula grants and direct funding to local public agency fleets.** Such an approach can help ensure that the ZIP and future investment plans do not leave public fleets behind and miss a key opportunity to deliver rapid ZEV adoption and air quality benefits to many of the most disadvantaged neighborhoods in the state.

Further, **ignoring the needs of public fleets may undercut the efficacy of closely related efforts at sister state agencies,** most notably the forthcoming public fleet rules in the Advanced Clean Fleets Regulation being advanced by the Air Resources Board.

Thank you for your attention. If you have questions, please contact Ariana Vito at ariana.vito@santamonica.gov.

Sincerely,



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City of Santa Monica

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