

**DOCKETED**

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*Comment Received From: Hans Larsen  
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**City of Fremont Comments on ZIP**

*Additional submitted attachment is included below.*



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May 11, 2022

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,

We applaud 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 communities and accelerate efforts by residents and businesses when they see their local government "leading by example."

Our comments build on Fremont's leadership in climate action and ZEV adoption and innovation. Examples include:

- First in nation to develop and deploy fully electric police patrol vehicles
- Completion of a plan with scope and cost estimates for fleet vehicle conversion to EV's based on available vehicles for sedans, light duty trucks, utility vehicles, and police patrol vehicles. This covers 225 vehicles. Estimated cost for supportive charging infrastructure is \$7 million.
- Initial implementation of 8 charging units at City facilities and purchase of 22 electric vehicles (16 fully electric; 6 plug-in hybrids)
- Previous partnership with the Energy Commission and Gridscape Solutions to install and operate solar/battery microgrids at three fire stations
- Recipient of the Institute of Local Government's Platinum Vanguard Beacon Award for Sustainability Best Practices—the largest jurisdiction in California so recognized
- Council-adopted goals of 55% greenhouse gas (GHG) emission reductions by 2030 and net zero GHG emissions by 2045

Vehicle electrification is a key component of the City's GHG reduction efforts. 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, However, the biggest remaining barrier to our ZEV advancement is the absence of dedicated funding for public fleet charging infrastructure. In general, the available power capacity at existing facilities has already been used for our initial deployment of EV infrastructure. New capacity will require a large upfront investment for power supply and

distribution which is best implemented to support a “build out” plan rather than in a “piecemeal” fashion.

We urge you to address the **unique charging needs of public fleets in the ZIP, which are notably absent from the ZIP**. Available grant funding at the national, state, and regional levels support EV infrastructure, but it comes with the condition that charging facilities be available to the public. This limitation doesn’t work for public fleet management since many facilities such as police centers and maintenance centers are secured sites and employees need to have reliable access to charging infrastructure. For police operations, there is also a need for fast charging infrastructure to support vehicles that need to be charged quickly between shift changes.

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 for ZEV fleet infrastructure to local agencies that are committed to electrification.**

Thank you for your attention. If you have questions, please contact either of the following:

- Hans Larsen, Public Works Director with responsibility for fleet vehicle procurement, fueling infrastructure, and maintenance, at [hlarsen@fremont.gov](mailto:hlarsen@fremont.gov) or (510) 494-4722.
- Dan Schoenholz, Community Development Director with responsibility for climate planning, at [dschoenholz@fremont.gov](mailto:dschoenholz@fremont.gov) or (510) 494-4438.

Sincerely,

DocuSigned by:

*Karena McGee Shackelford*

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Karena McGee Shackelford  
City Manager