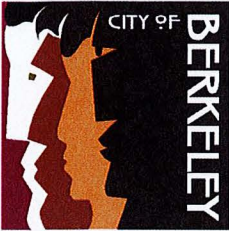


DOCKETED	
Docket Number:	21-TRAN-03
Project Title:	Zero Emission Vehicle Infrastructure Barriers and Opportunities
TN #:	243051
Document Title:	City of Berkeley comments on the Draft Zero-Emission Vehicle Infrastructure Plan (ZIP)
Description:	N/A
Filer:	System
Organization:	City of Berkeley
Submitter Role:	Public
Submission Date:	5/13/2022 10:25:05 AM
Docketed Date:	5/13/2022

*Comment Received From: City of Berkeley
Submitted On: 5/13/2022
Docket Number: 21-TRAN-03*

City of Berkeley comments

Additional submitted attachment is included below.



Public Works Department

May 12, 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,

Thank you for the State's leadership regarding acceleration of zero-emission vehicle (ZEV) adoption. To maximize the impact of the Zero-Emission Vehicle Infrastructure Plan (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 turnkey electrification that will significantly improve the air quality of our most disadvantaged neighborhoods and help us lead by example.

The City of Berkeley has played a leadership role in advancing ZEV adoption. We participated in the CEC-funded Bay Area Charge Ahead 2 project to install our first EV charging stations on City property in 2015. Since that time, we have continued to add public charging, have streamlined our permitting process for EV charging station installations, and have adopted local requirements that significantly increase the quantity of EV charging infrastructure in new construction projects. Berkeley was one of the first cities recognized on the GoBiz's EVCS Permit Streamlining Map. In 2020, Berkeley adopted its first Electric Mobility Roadmap, which includes a goal of demonstrating city leadership, and with the help of East Bay Community Energy (EBCE), completed an assessment of required actions to accelerate the electrification of the municipal fleet.

Berkeley City Council supports electrification of the City's municipal fleet to phase out fossil fuel use by 2030. However, **our ability to accelerate the electrification of our fleet is constrained**. The biggest barrier to our ZEV advancement is the absence of dedicated funding for public fleet charging infrastructure. Available grant funding at the national, state, and regional levels support EV infrastructure on the condition that

charging facilities be available to the public. This limitation doesn't work for public fleet management since many facilities, such as public safety and equipment maintenance centers, are secured sites. 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. City fleets are paid for with taxpayer and ratepayer dollars, and deliver critical public services to the community. Please address the **unique charging needs of public fleets in the ZIP, 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 costs necessary for the long-term expansion of electrical capacity and charging infrastructure** that's necessary for our fleets to convert to zero-emission.

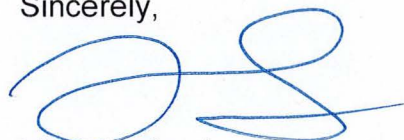
Agencies like ours require greater state support to cover upfront ZEV infrastructure investments. Such a coordinated approach could also ensure successful compliance of public agencies with the proposed Advanced Clean Fleets Regulation.

We strongly advocate for direct, formula funding to local public fleets that are committed to electrification. Please 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 and consideration.

Sincerely,



Liam Garland
City of Berkeley, Director of Public Works