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County of Sacramento Comments on ZEV Infrastructure Plan

Additional submitted attachment is included below.

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County Executive
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County of Sacramento

May 13, 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,

We appreciate the State's leadership in advancing zero-emission vehicle (ZEV) adoption and thank you for the substantial work effort represented by the ZIP. To maximize the impact of the ZIP and future California Energy Commission (CEC) investments, we strongly urge you to consider the unique needs of local agency fleets. Direct funding for public fleet infrastructure is a key missing opportunity in the ZIP strategy. Advancing direct formula funding to public fleets can accelerate turn-key electrification and will significantly improve air quality.

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

- 100 EV purchases budgeted for FY 22-23
- Draft Climate Action Plan (CAP) updated to require 100% of fleet purchases to be ZEV by 2035
- Six free level 2 EV chargers in employee parking garage, 20 free level 2 and two free DC fast EV chargers at the County administration building public garage, two free level 2 EV chargers at jury parking lot, seven free level 2 EV chargers dispersed throughout the Branch Center campus
- #1 Green Fleet in 2018 by 100 Best Fleets / Green Fleets Awards

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 a 100% ZEV fleet replacement requirement in our Draft CAP and a Board-adopted 2030 carbon neutrality goal. However, the biggest remaining barrier to our ZEV advancement is the absence of dedicated funding for public fleet charging infrastructure.

We urge you to address the unique charging needs of public fleets in 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 rapid expansion of electrical capacity and charging infrastructure that's necessary for our fleets to convert to electric.

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 with a fleet of more than 2,600 vehicles, conversion of our fleet requires investment in fleet-only chargers at dedicated corporation yards and Emergency Operation Centers to ensure continuity of critical services. This practice is necessary for the good stewardship of public taxpayer and ratepayer dollars; shared public infrastructure where County employees have to wait their turn while "on the clock" for delivering critical services is unacceptable and could compromise public health and safety. Hence, the CEC should increase funding to local agency fleets for infrastructure, which may involve investment in infrastructure placed in corporation yards or garages with restricted access.

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 will improve conditions in our Environmental Justice Communities. According to Sacramento County's Environmental Justice Element, "Public Facilities are essential for creating and maintaining healthy, connected and vibrant communities within Sacramento County". In support of this statement, Sacramento County Environmental Justice Element Policy 26 states that, "Sacramento County will advocate for equitable distribution of public facilities and levels of service within EJ Communities amongst service districts". Importantly, even with massive State and local investments, many of our Environmental Justice communities are unable to quickly transition to ZEVs. Hence, to ensure these neighborhoods benefit from ZEV technologies, the State can help facilitate the rapid electrification of public fleets locally to deliver air quality benefits to all, particularly our Environmental Justice Communities where our community members are disproportionately impacted by the effects of pollution and under-investment.

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 may be delayed.

III. Other Issues:

When considering light-duty vehicle chargers, please note the following 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 John Lundgren at lundgrenj@saccounty.gov or 916.874.8043.

Sincerely,

John Lundgren, Sustainability Manager
Office of the County Executive