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East Bay Community Energy (EBCE) comments in response to ZIP workshop

East Bay Community Energy (EBCE) is pleased to provide these comments in response to the workshop on the Zero-Emission Vehicle Infrastructure Plan (ZIP), held April 14, 2022.

Please reach out to me with any questions or for clarification.

Thank you,

-Paul D. Hernandez
Regulatory Analyst, TE

Additional submitted attachment is included below.



Date: May 13, 2022

To: California Energy Commission
Re: Docket No. 21-TRAN-03
Submitted via electronic commenting system to Docket 21-TRAN-03

Re: Comments of East Bay Community Energy on California Energy Commission's Workshop on the Zero-Emission Vehicle Infrastructure Plan

IN THE MATTER OF: The Zero-Emission Vehicle Infrastructure Plan; Docket No. 21-TRAN-03; RE: Staff Workshop on the Zero-Emission Vehicle Infrastructure Plan

East Bay Community Energy (EBCE) is pleased to provide these comments in response to the workshop on the Zero-Emission Vehicle Infrastructure Plan (ZIP), held April 14, 2022. These comments build from those EBCE filed within the docket on February 2nd, 2022. EBCE provides these comments based on our extensive experiences as the default Load Serving Entity (LSE) in Alameda County and the City of Tracy (San Joaquin County). EBCE's organizational strategy is focused on deploying charging infrastructure to meet the needs of zero-emission light, medium and heavy-duty vehicles in alignment with regional, statewide, and national objectives.

Introduction

EBCE secures electrical energy and manages energy-related climate programs including Transportation Electrification (TE), on behalf of our Joint Power Authority (JPA) member communities' residents and businesses. As the nonprofit public power provider and default LSE, EBCE delivers electricity with higher renewable energy content at a reduced cost to customers through the incumbent investor-owned utility's transmission and distribution system (PG&E).¹ As detailed in our comments filed on February 2nd, 2022, EBCE's current TE initiatives include:

- Alameda County Incentive Project (CALeVIP; sole co-funder to the CEC);
- Affordable Multifamily Housing Charging Infrastructure Technical Assistance Program;
- EBCE Owned Direct Current Fast Charging Network
- Pending recipient of GFO-21-603: Reliable, Equitable, and Accessible Charging for multi-family Housing (REACH);
- Municipal Fleet Electrification Technical Assistance Program;

¹ Assembly Bill 117 (Stat. 2002, ch. 838, codified at Public Utilities Code Section 366.2).

- Zero-Emission Medium-Duty and Heavy-Duty Goods Movement (recipient of CEC funding to develop Blueprint; EBCE funded Fleet Technical Assistance Pilot);
- PG&E's pending V2X Commercial Pilot (partner: EBCE)
- USEPA Brownfield Revitalization (recipient of funding to identify brownfields suited for redevelopment as fast charging hubs; and
- Others.

Building from our February 2nd, 2022 comments, EBCE provides this additional feedback, for potential integration into the ZIP.

Comments

Adjustments to geographic boundaries are warranted.

EBCE encourages the Energy Commission to go beyond census tract level information to identify localized impact. Specifically, the Energy Commission should assess more granular metrics to identify specific and targeted households. While a census tract-level lens can broadly identify DAC/LICs, there may be ways to circumvent the intended investment to support low-income households. In this regard, EBCE recommends the Energy Commission examine methods to streamline program access for those living in affordable housing, as these properties are designated to support low-income households and those severely burdened by housing costs.

Currently, CalEnviroScreen is able to broadly identify DAC/LICs at the census-tract level. That said, it does not mandate that affordable housing is prioritized. This could result in investments in premium property Multi-Unit Dwellings (MUD) that comply with DAC/LIC definitions per SB 535 and AB 1550, but are not designated affordable housing or serving low-income residents specifically. For example, market rate multifamily properties in DAC/LIC defined areas have benefited from state and investor-owned utility funded charging infrastructure incentive programs despite not serving low-income residents.

Conversely, affordable multifamily housing properties that by definition serve low-income residents but are located outside of DAC/LIC geographic boundaries have not been recognized as eligible for investment despite serving the same low-income eligible populations as those in DAC/LICs. Not enabling affordable multifamily housing providers to have equitable access to funding, whether in or outside of DAC/LIC geographic boundaries, is inequitable.

As such, we encourage IJJA stakeholders to ensure that affordable housing is universally prioritized by connecting investments based on income eligibility, not geographic boundaries.

EBCE also encourages the Energy Commission to evaluate the use of alternative identifiers, such as MUD "hotspots." EBCE recently released a mapping tool that identifies MUD "hotspots" throughout its service area in order to understand where direct current fast chargers are needed most to help renters who do not have at-home access make the transition to EVs.²

² ACIP MUD Hotspot Map

- **EBCE shares a successful use case for “hotspot” metrics.** In 2021 EBCE and the California Energy Commission's (CEC) Electric Vehicle Incentive Project (CALeVIP) partnered to develop and co-fund the Alameda County Incentive Project (AICP). The goal of this one-time program was to distribute funding that incentivized the deployment of publicly accessible Level 2 and DCFCs. Nearly half of Alameda County’s residents are renters, and most renters live in multifamily housing. The majority of the multifamily housing properties in Alameda County are 50+ years old which represents a barrier in scaling deployment of at-home charging infrastructure for renters due to the likely need of building level upgrades. To achieve the state’s ZEV goals, fast charging infrastructure is needed near where renters live. To ensure AICP investments in fast charging infrastructure were being deployed where they were needed most, EBCE created a MUD Hotspot mapping tool.³ Development of this tool shaped DCFC incentive funding requirements. Half of the AICP incentive budget for DCFCs was dedicated to projects deployed in MUD Hotspots to help renters without access to home charging benefits from EVs near-term (not limited to DAC/LIC geographic boundaries).

Notably, EBCE and CEC were able to work together to integrate the use of EBCE’s data tools, to target investments consistent with these community needs as highlighted by EBCE. Moving forward, EBCE encourages the Energy Commission to consider developing the “hotspot” process into a wider, state-driven effort to deploy resources more accurately to the highest-need communities.

Fund technical assistance for streamlined permitting.

EBCE encourages the Energy Commission to ensure that technical assistance funding is included as an investment within the ZIP. With respect to streamlined permitting initiatives EBCE worked with each of its JPA member communities, providing technical assistance to ensure full compliance in our service area with AB 1236 prior to the launch of our Alameda County Incentive Project. EBCE’s service area was the first urban area in California to achieve this milestone. CCAs have also allocated budgets to assist their city/county partners develop and adopt EV Reach Codes. For example, in support of EBCE’s JPA members, EBCE launched the Municipal Electrification Assistance Program.⁴ Cities have received technical assistance to support the development of a new Reach Code ordinance, and can request assistance to facilitate implementation of an existing Reach Code. Several of EBCE’s JPA member cities have participated in this offer including Albany, Berkeley, Fremont, Hayward, and Oakland— with EBCE serving as the coordination umbrella to help accelerate these activities. Recognizing these efforts as initiatives that can help achieve our long-term statewide charging infrastructure goals, EBCE encourages the ZIP to include “Reach Code TA” as an eligible investment.

Level 1 and Level 2 charging for light-duty electric vehicles

Recognizing the urgency to deploy EV charging infrastructure, EBCE provides the following observation with respect to Alameda County Incentive Project. Whereas Level 2 funding is still

³ CALeVIP applicants can see whether they are located in a MUD Hotspot by visiting this [link](#).

⁴ [Municipal Electrification Assistance Program](#)

available in the program (with approx. \$3.6 million available as of the date of this correspondence), the program's DCFC funding was oversubscribed within 4 minutes. As such, recognizing where there is higher demand for incentives, EBCE encourages the Energy Commission to consider prioritizing DCFC funding over Level 2 funding. With respect to building level MUD investments where feasible, should there be a continued focus on incentivizing Level 2 charging, access to the proper levels of technical assistance is required. As previously noted, in Alameda County approximately 90% of MUDs are 50 years or older. As such installing Level 2 chargers in MUDs can still trigger basic electrical capacity issues. To ensure that these needs can be identified and addressed, funding should be made available for concierge services with targeted technical assistance. EBCE has provided these services to affordable housing providers in a technology-neutral manner and would encourage the Energy Commission to maintain such a resource to support Level 2 MUD deployment.

Fund retrofits to promote alignment with Caltrans "fix it first" policy framework.

With respect to standardization of charging and fueling infrastructure EBCE encourages the Energy Commission to apply Caltrans 'fix it first' philosophy to the ZIP policy framework. For example, the IIJA funding serves as an opportunity to enable existing charging infrastructure nearing the end of its useful life to be modernized with upgraded equipment. In addition, there are opportunities to link the ZIP to CalSTA's Climate Action Plan for Transportation Infrastructure (CAPTI), which prioritizes utilizing Caltrans right-of-way or other lands to provide safe truck parking opportunities, and leverage these real estate assets to co-locate beneficial charging facilities.

Charging infrastructure for medium-and heavy-duty (MD/HD) vehicles

EBCE is pleased that the Energy Commission is soliciting feedback on MD/HD infrastructure initiatives as our service area is among the most strategic trade locations in the U.S. with connections to regional, state, national, and international markets. Alameda County provides the majority of fundamental goods movement infrastructure in Northern California and includes diverse elements of the supply chain – from local deliveries, to electronic components inputs serving the tech industry, to Central Valley produce that utilizes the County's infrastructure as an agricultural export gateway.⁵

To date, much of the focus on zero-emission goods movement has been centered on Port activities. However, in 2019 the Bay Area Air Quality Management District (BAAQMD) performed a health risk assessment of emissions in West Oakland and concluded that emissions from drayage trucks with an operational footprint at the Port of Oakland represented just 2% of the total contribution to diesel particulate matter (DPM) concentrations in West Oakland. BAAQMD also found that 24% of the combined highway and street incremental local cancer risk in West Oakland was attributable to MD/HD non-Port trucks.⁶

EBCE encourages the Energy Commission to conduct an analysis of MD/HD Department of Motor Vehicle (DMV) registration and I.H.S data to understand the ecosystem of MD/HD vehicles registered in each county statewide (e.g., ensure investments include but are not

⁵ *Alameda CTC Goods Movement Fact Sheet (2020).*

⁶ *Owning our Air: West Oakland Community Action Plan (2019).*

limited to drayage trucks). This will ensure a comprehensive transition to a ZE goods movement economy.

In Alameda County and the City of Tracy there are tens of thousands of Class 3-8 vehicles registered to businesses and independent operators. Of this, an estimated 40% are registered in DAC/LICs.⁷ This means the majority of MD/HD vehicle trips are originating outside of DAC/LIC boundaries, but may have operational routes through or in DAC/LICs. If this cohort of stakeholders is excluded from funding opportunities that can assist with the transition to a ZE MD/HD vehicle because of their domicile location, then we are not delivering the biggest benefit possible to our most vulnerable residents in DAC/LICs. In turn, EBCE encourages the Energy Commission to allow MD/HD vehicles who can demonstrate a frequent operational footprint in or through DAC/LICs to be eligible for funding.

While some of these vehicles will recharge at facilities where they are domiciled or at third-party logistic facilities where they do business, many others will need access to convenient common fast charging yards that operate much like a wholesale gas station. These private facilities are outside of Port real estate boundaries and planning for this infrastructure must begin today to ensure driver confidence in making the transition to ZE MD/HD vehicles. In turn, EBCE encourages the ZIP to allow funding to be applicable for projects strategically located outside of Port boundaries and/or DAC/LICs.

Additional advisory

To maximize competitiveness while avoiding the collection of non-passing applications, EBCE encourages the Energy Commission to begin to phase out first-come-first-serve programs. With respect to IJJA funding, it is highly encouraged that the Energy Commission established a competitive process for ZIP funds.

Conclusion

Thank you for reviewing our comments. EBCE appreciates the opportunity to provide this feedback to the Energy Commission, and encourages the integration of the concepts that we have shared into the emerging ZIP framework. Please reach out to Paul D. Hernandez, Principal Regulatory Analyst, Transportation Electrification, with any questions or for clarification (pfernandez@ebce.org).

Respectfully Submitted,

-Paul D. Hernandez

Principal Regulatory Analyst, Transportation Electrification

East Bay Community Energy

⁷ <https://ww3.arb.ca.gov/cc/capandtrade/auctionproceeds/lowincomemapfull.htm>