

DOCKETED

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Charge Ahead Comments on 2022-2023 Investment Plan Update

See attached document

Additional submitted attachment is included below.

October 26, 2022

Commissioner Monahan
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: 2022-2023 Investment Plan Update for the Clean Transportation Program (CEC-600-2022-053)

Dear Commissioners and Staff,

The undersigned members of the Charge Ahead California Campaign appreciate the opportunity to provide comments on the California Energy Commission's (CEC's) 2022-2023 Investment Plan Update for the Clean Transportation Program. The Clean Transportation Program is vital in helping stimulate economic activity and reduce air pollution and greenhouse gas emission, and we strongly support funding to accelerate zero-emission vehicle (ZEV) deployment. We offer the following comments to strengthen what is already a well-developed plan.

Medium- and Heavy-Duty Infrastructure Funding

Building off of the historic \$10 billion state budget package, the draft investment plan sets out unprecedented levels of investment in clean transportation. This funding will provide significant support for critical zero-emission vehicle (ZEV) and infrastructure programs, unlocking billions in public health, climate, and jobs benefits for all Californians.

Notably, the draft investment plan includes roughly \$1.7 billion in funding to support medium- and heavy-duty ZEV infrastructure, appropriately reflecting the importance of electrifying the most polluting vehicles in the state to provide critical air quality and health benefits to local communities disproportionately impacted by diesel emissions. Although medium- and heavy-duty vehicles are only six percent of California's fleet, they contribute twenty-one percent of transportation greenhouse gas emissions, are the single largest source of NOx emissions, and account for at least a quarter of diesel particulate matter emissions.

Emissions from medium- and heavy-duty vehicles disproportionately impact low-income communities and communities of color that often live near freeways, ports, railyards, warehouses and other facilities that generate significant levels of localized diesel exhaust. Diesel emissions are toxic and dangerous to those breathing closest to the source of pollution; exposure to significant amounts of diesel exhaust can lead to premature death and other devastating health impacts including asthma and respiratory impacts, pregnancy complications and adverse reproductive outcomes, cardiac and vascular impairments, and heightened cancer risk. Accordingly, we strongly support the draft investment plan's increased emphasis on medium-

and heavy-duty ZEV infrastructure to help address this source of pollution and bring significant health benefits to local communities.

Investment in medium- and heavy-duty ZEV infrastructure is also critically important in light of the climate and transportation goals set by California's executive orders and state regulations like the Advanced Clean Trucks and Advanced Clean Fleets rules. As the draft funding plan appropriately highlights, a significant charging infrastructure gap remains for supporting the 180,000 medium- and heavy-duty vehicles anticipated for 2030. Significant investment in medium- and heavy-duty ZEV infrastructure will be essential for supporting all the new electric cars and trucks coming over the next decade and ensuring the benefits of medium-and heavy-duty electrification are realized.

Equity

We commend the draft investment plan's commitment to ensuring more than 50 percent of Clean Transportation Program funds go to projects that benefit low-income and disadvantaged communities. The CEC should continue to prioritize investments that directly benefit low-income, disadvantaged, rural and tribal communities, and we encourage the CEC to work to significantly improve upon the 49 percent allocation achieved in past investment plans. The CEC should strive significantly exceed the 50 percent target set out by the draft investment plan to ensure benefits flow to the communities most in need, consistent with higher targets recently set out by other state agencies. For example, recent draft guidance from the CPUC establishes a minimum investment target of 65 percent for underserved communities, and the CEC should consider the draft investment plan's 50% target as an absolute minimum floor. Further, the CEC should also look beyond simply allocating 50% of total funds to projects *located* in disadvantaged and low-income communities to ensure these investments achieve direct, meaningful, and assured benefits to priority populations.

Increased Access for Multifamily and Rural Charging

The draft funding plan also places increased emphasis on expanding access to the benefits of transportation electrification to residents of multifamily buildings and rural communities. As the funding plan appropriately notes, these communities have disproportionately lower access to charging than residents of single-family homes and urban communities, resulting in heightened barriers to EV adoption. The establishment of new programs focused on supporting infrastructure deployment in these communities is a critical step in addressing existing inequities in these communities, and we strongly support the draft funding plan's focus on these historically underserved markets.

Emerging Opportunities

The draft funding plan sets aside \$97 million for emerging vehicle sectors that are only beginning to transition to zero-emission technologies, including zero-emission aviation,

locomotive, and marine vehicles, as well as for advancing vehicle-grid integration. We support the draft funding plan's increased attention to these critical emerging areas, which will be essential for supporting the state's long-term climate and air quality goals.

Our organizations are deeply supportive of the Clean Transportation Program and the draft funding plan's emphasis on ZEVs and equity. We thank you for this opportunity to provide comments on the draft investment plan as we all work together to help California achieve its climate and clean air objectives while prioritizing benefits for marginalized groups and our state's most vulnerable communities.

Sincerely,



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