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WAVE Comments on the 2022-2023 Investment Plan Update for the Clean Transportation Program - Docket No 22-ALT-01

Please see attached.

Additional submitted attachment is included below.

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October 26, 2022

Patrick Brecht
Project Manager
California Energy Commission
715 P Street
Sacramento, CA 95814

Re: WAVE Comments on the 2022-2023 Investment Plan Update for the Clean Transportation Program - Docket No. 22-ALT-01

Dear Mr. Brecht:

WAVE (Wireless Advanced Vehicle Electrification) appreciates the opportunity to comment on the 2022-2023 Investment Plan Update for the Clean Transportation Program – Docket No. 22-ALT-01 (Funding Plan). As a manufacturer of charging solutions for medium and heavy-duty (MHD) electric vehicles, WAVE appreciates the time and effort the California Energy Commission (CEC) put into the Funding Plan. Below please find WAVE's answers to the questions presented on Slide 80 of the CEC's Presentation – Advisory Committee Meeting for the Clean Transportation Program.

1. **Given the prescriptive nature of the General Fund allocations from the State Budget Acts of 2021 and 2022, should the Investment Plan shift fungible Clean Transportation Program dollars to other categories? (e.g. low-carbon fuel production; ZEV manufacturing; workforce training and development?)**

The allocations proposed in the Funding Plan are generally reasonable but maximum flexibility should be built into the program in terms of the timing of funding availability. For example, significant funding is available for drayage truck infrastructure in the first two years of the Funding Plan, with a significant drop off in year three and then no funding available in year four. If funds are only available in the specifically designated years, with no opportunity to carry over the funds to future years, it is possible that not all of the money will be spent. The reason the money might not be spent is that there is no certainty – with current electric vehicle production constraints – that enough vehicles will be available for purchase and delivery in each of the designated years. However, with funding flexibility that allows carryover of unused funds to subsequent years, projects can still be delivered in the four-year funding window, even if production volumes/deliveries are higher in the later years.

Similarly, although utilities, especially investor-owned utilities, have begun to roll out special programs for electric vehicle-related project deployments, there will be an incredible amount of demand for these resources – both fiscal and labor demand – from all the customers looking to procure and install charging infrastructure. This demand could create constraints in the near term as utilities continue to accumulate lessons learned from these programs as well as increase staffing to meet these demands. Accordingly, these constraints – just like vehicle production constraints – might mean certain projects that are "ready" for deployment from the customer's perspective might not "ready" for deployment from a funding

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perspective. As such, allowing for unspent funds to carry over to subsequent years of the Funding Plan will better ensure the funds are available and spent – and thereby meeting the goals of the plan.

2. **Does the timing and allocations between light-duty and medium- duty/heavy-duty infrastructure investments in the Investment Plan strike the right balance for ZEV acceleration? If not, where should adjustments be made and why?**

As noted above, timing and allocations in the Funding Plan are generally reasonable, however, flexibility is the key. Limited vehicle availability due to production constraints, labor availability, and supply chains might mean that customers that are eager to procure vehicles in the near term might have to wait 18-24 months for delivery or more (this is not uncommon for current delivery timelines). Similarly, it is not currently clear that utilities will be able to meet – in the near term – the massive increase demand for their services this funding will stimulate. Therefore, CEC should consider and ensure maximum flexibility for funding availability throughout the four years of this Funding Plan, including the opportunity to carry over unspent funds into later years of the plan.

3. **What should the Investment Plan include within each funding allocation to improve equitable access and benefits from that allocation?**

With respect to medium- and heavy-duty (MHD) vehicles, much of the funding can be expected to provide benefits to underserved communities because many of these vehicles operate in and/or serve underserved communities. MHD trucks are often domiciled in and spend a significant amount of operating time in underserved communities. By converting these vehicles to zero-emission vehicles, air quality in these communities can be expected to improve without moving the jobs these businesses create out of the communities. Similarly, underserved populations comprise the majority of transit ridership, especially bus ridership, meaning the air quality benefits of conversion to zero emissions operations will directly decrease pollution impacts on these communities.

Sincerely,

Vincent Pellecchia

Vincent Pellecchia
Director of Policy and Market
Development