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*Docket Number: 20-ALT-01*

**Comments of East Bay Community Energy on Clean Transportation Program Proposed Workforce Investments and Activities Workshop**

Docket Number 20-ALT-01

CEC Docket Office:

Attached, please find our document:

-- Comments of East Bay Community Energy on Clean Transportation Program Proposed Workforce Investments and Activities Workshop

Thank you for reviewing our comments, and please reach out with any questions or for clarification.

Regards,

Paul D. Hernandez  
Principal Reg. Manager, Transportation Electrification  
East Bay Community Energy

*Additional submitted attachment is included below.*



**Date:** February 24, 2023

**To:** California Energy Commission  
Docket Number 20-ALT-01

*Submitted via electronic commenting system to Docket 20-ALT-01 at [docket@energy.ca.gov](mailto:docket@energy.ca.gov).*

**Re: Comments of East Bay Community Energy on Clean Transportation Program Proposed Workforce Investments and Activities Workshop**

East Bay Community Energy (EBCE) is pleased to provide these comments in response to the Clean Transportation Program Proposed Workforce Investments and Activities Workshop, held February 10, 2023.

## **Introduction**

EBCE provides these comments based on our extensive experience as the default Load Serving Entity (LSE) in Alameda County and the City of Tracy in neighboring San Joaquin County, as well as our initiatives focused on deploying Zero Emission Vehicles (ZEV) charging infrastructure and programs in alignment with regional and statewide objectives. EBCE secures electrical energy and manages energy-related climate change programs, including Transportation Electrification (TE), on behalf of our Joint Power Authority (JPA) member communities' residents and businesses.<sup>1</sup> 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).<sup>2</sup> EBCE's current TE initiatives include:

- **Zero-Emission Medium- and Heavy-Duty Goods Movement**
  - EBCE was awarded a California Energy Commission (Energy Commission) grant to develop a *Zero Emission Medium- and Heavy-Duty (MD/HD) Goods Movement Blueprint* (Blueprint). The goal of the Blueprint is to accelerate the transition to zero-emission 3-8 Class goods movement vehicles throughout our service area. To achieve this goal, EBCE will develop actions to be implemented across five key areas of focus: vehicles, infrastructure, financing, workforce

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<sup>1</sup> <https://ebce.org/about/>

<sup>2</sup> Assembly Bill 117 (Stat. 2002, ch. 838, codified at Public Utilities Code Section 366.2).

development and community benefits. CALSTART has been EBCE's technical consultant supporting these efforts. With regards to workforce development, EBCE has taken a deep dive with regional stakeholders to identify critical workforce training gaps that need to be filled to transition the MD/HD goods movement economy in EBCE's service area to zero-emission. In August, 2022 EBCE released a summary of these *Summary of Workforce Training and Needs*;

- EBCE has also piloted a Technical Advisory Services program that provides targeted MD/HD goods movement stakeholders with free technical assistance. This technical assistance included fleet electrification assessments and a rebate application concierge service. EBCE will scale its Technical Advisory Services program this spring in collaboration with Frontier Energy and GNA;
- **Brownfield Revitalization.** EBCE is conducting assessments in its service area, through a grant from the U.S. EPA, to determine the feasibility of revitalizing brownfields into ZEV fast-charging hubs for two use cases: light-duty passenger EVs and MD/HD goods movement vehicles. In recognition of this first-of-its-kind project, EBCE was the recipient of the 2022 National Notable Achievement Award from the U.S. EPA;
- **Alameda County Incentive Project (CALeVIP).** EBCE and Energy Commission partnered to co-fund a \$17.3 million incentive program to make the deployment of publicly accessible Level 2 and Direct Current Fast Chargers (DCFC) simple and affordable. Equity was prioritized in structuring the program with 50 percent of the budget allocated to projects in disadvantaged and low-income census tracts (DAC/LIC). Additionally, to ensure renters in multifamily housing properties have access to convenient charging infrastructure near where they live, 50 percent of the budget for DCFCs was also dedicated for projects in areas with a dense concentration of multifamily units or multifamily "hotspots". The program launched December 1, 2021, with demand rapidly outstripping supply;
- **EBCE's Equitable Direct Current Fast Charging Network.** EBCE is building 40 to 50 DCFC hubs in its service area over the next 10 years to meet the needs of passenger EVs;
- **EBCE and PG&E Vehicle-to-Grid Integration (VGI) Project.** EBCE is working on a pending commercial VGI pilot with the investor owned utility, PG&E, who operates the transmission and distribution grid in EBCE's service area. Through the pilot, PG&E will leverage EBCE's MD/HD goods movement efforts including engagement of key stakeholders;
- **Municipal Fleet Electrification Technical Assistance Program.** EBCE has provided free technical assistance to each of its JPA members (cities, county) over the last 2-years. As a result, each of its local government partners has completed fleet electrification assessments for their light-duty vehicle portfolios. In 2023-24 EBCE will

continue to support its partners by scaling this technical assistance to their MD/HD vehicle portfolios, and providing a Charging-as-a-Service product.

Based on these localized and community-driven efforts, as well as detailed experiences specific to clean transportation and workforce development, EBCE provides the following feedback on the workshop.

## Comments

### I. Order of Magnitude

EBCE provides the following recommendations to strengthen the impact and sustainability of workforce investments:

- ***Increase workforce funding to levels that will adequately support rapid zero-emission MD/HD fleet growth and operational continuity.*** As a broad observation, a \$10 million investment in ZEV Workforce Development is deeply insufficient in relation to the amount of investment being made in vehicles and refueling infrastructure. For example, California Budget 2022/23 alone has authorized an unprecedented multiyear, multibillion dollar investment in zero-emission Class 3-8 vehicles (upwards of \$3 billion), across CARB and CEC, in:
  - Heavy-duty ZEVs and supporting infrastructure;
  - Zero-emission short-haul (drayage) trucks;
  - Zero-emission transit buses;
  - Electric school buses;
  - Off-road equipment and fueling infrastructure;
  - Port electrification; and
  - Others.

Moreover, emergent regulations including Advanced Clean Fleets (ACF) Regulation will further trigger rapid adoption of zero-emission MD/HD vehicles, creating additional demand for a trained workforce capable of keeping trucks and vans on the road to ensure business continuity for fleets, independent owner operators, and the goods movement economy broadly. As such, EBCE encourages the Energy Commission (and CARB) to consider significantly increasing funding for workforce development (new and up-skilled workers) to support the demands that will inevitably be triggered by the unprecedented investment being made in the deployment of zero-emission Class 3-8 vehicles.

- ***Not enough funding to support multi-year and complex ZEV training needs.*** As part of EBCE's CEC funded Blueprint, EBCE discussed workforce gaps and needs with relevant stakeholders including community colleges, nonprofit training organizations, and labor unions. These stakeholders have conveyed that multi-year programs require a

much higher level of investment and commitment to ensure programmatic success and sustainability. Moreover, for complex and technology-driven learnings, these are not simply “train-the-trainer” programs. While trainer capacity building is critical, hard costs (e.g., vehicles, training equipment including computers, software, charging infrastructure, etc.), and soft costs (e.g., insurance, rent, utilities, marketing, administrative expenses, and more) are essential to workforce training programs, and can rapidly exceed the presented funding thresholds. As identified in EBCE’s *Summary of Workforce Training and Needs* report produced as part of its Blueprint, one of the key obstacles/challenges to program development was the lack of Class 3-8 vehicle training resources.<sup>3</sup> In this regard, EBCE remains concerned that \$10 million in investment will be inadequate to meet these complex workforce challenges.

## II. Qualitative Adjustments

EBCE recommends the following qualitative adjustments, which are intended to increase interest in zero-emission Class 3-8 workforce programs:

- **Rescope ZEV workforce training:** Community colleges have shared that enrollment in training programs broadly are down nationwide and that potential new trainees are more attracted to technology programs than maintenance programs. However, zero-emission Class 3-8 vehicles are advanced technology, driven and maintained by computers and software. To increase enrollment of new workers, and upskill existing workers, EBCE encourages the Energy Commission to consider exploring how to rebrand ZEV “maintenance/mechanical” training programs into ZEV “technology” training programs. This rebranding would result in a more contemporary, technology-driven lens that may lead greater interest from current and emerging professionals, as ZEVs and their supporting infrastructure are “cutting edge” technologies.

## III. Programmatic Recommendations

EBCE suggests that Energy Commission conduct fiscal assessment of existing resources, and:

- **Reallocate underutilized program dollars to workforce initiatives.** To maximize the use of existing resources, EBCE encourages the Energy Commission to look into opportunities to reallocate dollars from underutilized programs into workforce initiatives. This should include assessment of dollars currently available (and previously authorized) via the Energy Commission’s Clean Transportation Program, also known as the Alternative and Renewable Fuels and Vehicle Technology Program (ARFVTP), and other programs. Redirecting these existing funds is less burdensome than securing additional funds, and such assessment activities align well with the general “belt tightening” activities for 2023 ZEV investments (see: 2023-24 Governor’s Budget

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<sup>3</sup> See *Blueprint Summary of Workforce Training and Needs*, Page 14.

proposal, which proposes a 11% reduction in ZEV investments this fiscal year).<sup>4</sup> As such, EBCE encourages the Energy Commission to conduct assessments of underutilized program dollars for potential reallocation to workforce initiatives.

#### **IV. Conclusion**

EBCE applauds the Energy Commission's ZEV initiatives. That said, to avoid unintended consequences, it is mission critical that the Energy Commission ensure that the ZEV workforce is trained proportionate to operational demands that will be placed upon MD/HD industry through a multitude of regulations. In analogy, not adequately training the workforce necessary to support the operational demands of MD/HD fleets may cause bottlenecks and supply chain disruptions akin to those recently experienced across California's ports, which saw massive back-ups and operational challenges that negatively impacted goods movement businesses and end consumers and the broader economy.

To avoid such issues, EBCE encourages Energy Commission to:

- Evaluate methods to increase funding for workforce programs, proportionate to MD/HD ZEV growth (i.e. above a \$10 million statewide investment);
- Assess methods to rebrand ZEV workforce training into "technology training;" and
- Evaluate existing and underutilized program dollars for reallocation to workforce training programs.

Thank you for reviewing our comments. EBCE appreciates the opportunity to provide this feedback to the Energy Commission and encourages integration of the concepts that we have shared.

Please reach out to Paul D. Hernandez, Principal Regulatory Manager, Transportation Electrification, with any questions or for clarification ([phernandez@ebce.org](mailto:phernandez@ebce.org)).

Respectfully Submitted,

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**-Paul D. Hernandez**

Principal Regulatory Manager, Transportation Electrification

East Bay Community Energy

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<sup>4</sup> GOVERNOR'S BUDGET SUMMARY — 2023-24; Page 44; See: ZEV Investment; Website Access: Budget Summary ([ca.gov](http://ca.gov))