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*Comment Received From: Redding Electric Utility
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ZEV Fleet Comment Letter

Additional submitted attachment is included below.

August 3, 2023

California Energy Commission
Docket Unit, MS-4
Docket No. 20-TRAN-04
715 P Street
Sacramento, California 95814

RE: Comments on July 2023 Staff Pre-Solicitation Workshop for Municipal Fleets

Dear California Energy Commission,

We, the City of Redding's Electric Utility, express our appreciation for the opportunity to offer comments on the July 21, 2023, Staff Pre-Solicitation Workshop for Municipal Fleets Electric Vehicle (EV) Infrastructure organized by the Clean Transportation Program (CTP) of the California Energy Commission (CEC). We value the chance to provide feedback on the CEC's proposal for a municipal fleet-focused solicitation aimed at facilitating the installation of charging infrastructure necessary for ZEV adoption by public agencies.

In response to the questions posed by the CEC staff during the workshop, we offer the following comments:

Expanding Eligibility: We encourage the CEC to broaden eligibility to include fleets owned by municipalities, as well as other local public agencies, such as special districts. Furthermore, we recommend allowing funds to be used for necessary utility capacity upgrades with partner agencies. This approach would promote agency cooperation and optimize funding utilization, fostering efficiency and collaboration.

Public Charger Accessibility: We advise against providing preferences for chargers that are made available to the public. Government fleets typically charge in secure areas, and the solicitation should not incentivize relocating those chargers to public areas, as it could impede fleet vehicles' access to the chargers.

DCFC Cap: If a cap on DCFC is implemented, it should be set higher than 25% to accommodate the needs of zero-emission vehicles requiring frequent dispatch or emergency response. Restricting Level 2 chargers might be impractical for numerous municipalities due to space limitations and frequent vehicle usage. Utility departments and emergency vehicles, major emitters, necessitate the use of DCFC. If the CEC decides to include a cap, fleets should have the option to request exceptions based on their unique composition and usage patterns.

Medium-Duty Vehicle Inclusion: Charging infrastructure intended for light-duty vehicles should also be allowed to support medium-duty vehicles, given their similar vehicle types and charging needs. For example, Ford F-150 Lightnings are available in configurations that bring the GVWR over 8,500 lbs. Furthermore, promoting the utilization of charging infrastructure for both light-duty and medium-duty vehicles could increase infrastructure uptake. The city of Redding, being a predominantly rural area, heavily relies on medium-duty vehicles due to our versatile applications for various needs. Of the 482

vehicles in the City of Redding fleet, 40% are light duty and 40% are medium duty. Thus, including medium-duty vehicles in the funding provisions would greatly benefit rural and disadvantaged communities, enabling them to make the most efficient use of available funding resources.

Fleet Size Award Categories: We suggest introducing award categories based on fleet sizes, such as Small Fleets vs. Large Fleets, to ensure equitable access to funding for government agencies with fewer resources.

DAC/LIC Requirement: While a requirement to install 50% of chargers within a DAC/LIC is not practical due to fleet home base location constraints, if a DAC/LIC requirement is deemed necessary, it should be aligned with other funding programs like CALeVIP and adopt a standardized determination process based on census track data. This approach will ensure a fair distribution of benefits to disadvantaged and low-income communities.

ZEV Readiness: Ensuring fleet electrification readiness is crucial for applicants. Having an existing ZEV plan developed is essential to ensure comprehensive planning, including addressing infrastructure needs, vehicle replacement schedules, identifying low-hanging fruit opportunities, and meeting all relevant requirements. This will guarantee that funds are utilized most effectively.

The City of Redding Electric Utility appreciates the opportunity to provide input on the concept of this Municipal Fleets EV Infrastructure grant solicitation and is available to support any further questions.

Sincerely,



Joseph Bowers

Assistant Director, Resources