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*Comment Received From: County of Los Angeles Internal Services Department  
Submitted On: 8/3/2023  
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**County of Los Angeles' Comment Letter Regarding the Municipal  
Fleets Electric Vehicle Infrastructure Program**

*Additional submitted attachment is included below.*



# County of Los Angeles INTERNAL SERVICES DEPARTMENT

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*"Trusted Partner and Provider of Choice"*

August 1, 2023

Drew Bohan, Executive Director  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

**Re: Comments on Municipal Fleets Electric Vehicle Infrastructure Solicitation**

Dear Mr. Bohan,

On behalf of the County of Los Angeles (County), we thank you for the opportunity to submit comments on the California Energy Commission's (CEC) Municipal Fleets Electric Vehicle Infrastructure program. The Internal Services Department (ISD) plays a major role in supporting all County departments and commissions; and our Office of Energy and Environmental Services (EES) operates one of the nation's largest networks of municipally owned electric vehicle supply equipment (EVSE). Since 2015, the County has installed nearly 1,300 Level 2 and Direct Current Fast Charging (DCFC) ports over 83 County facilities. An additional 1,000 ports across 100 sites are currently under development to support County fleet electrification and provide vehicle charging for employees as well as the public.

The County has the largest population of any county in the nation with nearly 10 million residents, accounting for approximately twenty-seven percent (27%) of California's population. The County is also home to more than fifty percent (50%) of the state's disadvantaged communities (DACs) at or exceeding the seventy-fifth percentile (75%) per CalEnviroScreen 4.0 DAC criteria. The communities especially impacted by pollution surround the ports of Los Angeles and Long Beach (POLA and POLB) which serve as a global hub for drayage and goods movement. Together, POLA and POLB are the largest ports in the nation, moving over twenty (20) million cargo containers in 2021 alone as well as being the single largest fixed source of air pollution in Southern California.

We have an intimate knowledge of the issues facing our most vulnerable communities, and the extensive reach of our growing network uniquely positions the County to develop critical infrastructure in areas that are often disproportionately burdened by environmental pollution and historically underserved. We are at the forefront of electrification and appreciate the chance to share our comments on this important program.

We respectfully submit the following comments and questions indicating areas of improvement and clarification for the Municipal Fleets Electric Vehicle Infrastructure program:

1. **California Energy Commission (CEC) should expand applicant eligibility to include additional governmental entities in addition to municipal fleet owners.** We recommend that the CEC adjust the primary applicant requirements for the Municipal Fleets Electric Vehicle Infrastructure program to include all governmental fleets including ones operated by counties.
  - a. Governmental entities such as counties are often reliant on incentive programs to fund electrification projects and the deployment of battery electric vehicles. Expanding applicant eligibility will provide governmental entities a critical avenue to acquiring funding to facilitate the transition of their internal combustion engine vehicles to zero-emission vehicles.
  - b. Governmental entities have a deep understanding of local issues and extensive experience engaging and serving their residents, including DACs and low-income communities. In broadening applicant eligibility,

the program will be able to fund a wider range of project types allowing for more project blueprints to assist governmental fleets conducting a wide variety of different services and operations in the electrification of their fleets.

By opening eligibility to all governmental fleets, the CEC will ensure that governmental fleets can be more proactive in the electrification of their fleets, allowing them to meet both local and regional sustainability goals. An example of such electrification goals is the 2019 Our County regional County regional sustainability plan released by Los Angeles County which tasked ISD with installing 5,000 EV charging stations at County facilities by 2025.

2. **The CEC should increase funding flexibility for DCFC based projects.** The Municipals Fleets Electric Vehicle Infrastructure program as it is currently structured caps the amount of program funding that can go towards DCFC projects at 25% or \$7.5 million of the total program funding of \$30 million. We recommend that the CEC increase the flexibility for applicants to pursue DCFC projects by increasing the cap allotted to DCFC projects from 25% to 55%.
  - a. While some governmental fleets can charge overnight using Level 2 chargers, many governmental entities have fleets with specific use cases that require them to operate throughout the day thus requiring fast charge times that can only be provided by DCFC chargers.
  - b. The funding cap placed on DCFC deployment is a new occurrence in programs that funds both Level 2 and DCFC chargers. In the CEC's Reliable, Equitable, and Accessible Charging for Multi-Family Housing grant program, which funded Level 1, Level 2, and DCFC chargers, no funding cap was placed on DCFC chargers.
  - c. The costs associated with installing DCFC chargers are several degrees times higher than those associated with deploying Level 2 chargers. DCFC projects are impacted by long lead times, site improvements, utility infrastructure upgrades, and high cost of equipment. Due to these high costs, government fleets highly rely on incentive programs to fund DCFC projects. The 25% funding cap for DCFC projects will severely hamper the number of DCFC chargers the Municipal Fleets Electric Vehicle Infrastructure program will be able to fund.
  - d. The Municipal Fleets Electric Vehicle Infrastructure program will be an important funding source for governmental fleets to help fund their transition to zero-emission vehicles. There is currently little public funding to assist governmental entities in transitioning their light-duty vehicles to battery electric. The majority of grant funding administered by the CEC and CARB regarding zero-emission vehicle technology is geared towards medium-and-heavy-duty vehicles due to their high cost and high pollution. However, there are hundreds of light-duty governmental fleets throughout California that require financial assistance. By limiting the amount of funding towards DCFC, the CEC is limiting the reach of the Municipal Fleets Electric Vehicle Infrastructure program.

We are supportive of the CEC's goal to deploy charging infrastructure that enables municipal fleets to electrify their fleets. Please do not hesitate to reach out to ISD's General Manager of Energy and Environmental Services, Minh Le, at [MSLe@isd.lacounty.gov](mailto:MSLe@isd.lacounty.gov) as you move throughout this process.

Thank you in advance for your consideration, and we look forward to continuing to engage with you throughout the development of the Municipal Fleets Electric Vehicle Infrastructure program.

Sincerely,

Minh Le  
General Manager of Energy and Environmental Services  
Los Angeles County Internal Services Department  
[MSLe@isd.lacounty.gov](mailto:MSLe@isd.lacounty.gov)