

**DOCKETED**

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**City of Sacramento Comments on Government Fleets Electric Vehicle Infrastructure Program**

*Additional submitted attachment is included below.*



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*Submitted Electronically*

California Energy Commission  
Docket Log (20-TRAN-04)  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Subject: City of Sacramento Comments on July 2023 Workshop for Draft Government Fleets Grant Program**

Dear California Energy Commission staff,

Thank you for the opportunity to provide comments on the proposed Government Fleets Electric Vehicle Infrastructure funding. We applaud the CEC for developing this funding opportunity focused on the unique electric vehicle infrastructure needs of municipal fleets. We feel that the proposed funding program is great first step in responding to comments raised in our letter dated May 13, 2022 (TN # 243073; Docket 21-TRAN-03). This targeted funding for public fleet infrastructure addresses an essential gap in the state's current programs, will support accelerated municipal electrification efforts, and will significantly improve the air quality of our most disadvantaged communities. **We strongly support this grant program and advocate for continued funding allocations for municipal fleets and future rounds to support ongoing public fleet electrification.**

The City of Sacramento (City) operates a full-service municipal fleet of over 2,000 vehicles, including 119 light-duty electric vehicles. Since 2017, the City's Council-approved [Fleet Sustainability policy](#) has guided the aggressive incorporation of zero-emission vehicles into our fleet operations and the recently approved Advanced Clean Fleets regulation will drive continued acceleration of our fleets transition to zero-emission vehicles. Tight local budgets often challenge public agencies like ours to accelerate fleet replacements with zero-emission options. We have replacement cycles to fund vehicle replacement costs, however, we often do not have adequate budget for EV infrastructure to support these replacements. Although rebates are available, they are typically inadequate to cover the additional backup electrical infrastructure and service that's needed. **Direct, targeted funding for public fleet**

**infrastructure is essential to our ability to further accelerate the electrification of our fleet.**

We would like to thank CEC staff for convening the recent pre-solicitation workshop for the proposed Government Fleets Electric Vehicle Infrastructure grant program on July 21, 2023, and for inviting stakeholder feedback. The city welcomes the opportunity to work with the CEC on developing this funding program and have compiled the following responses to questions posed in the workshop.

Should we include other entities besides municipal fleet owners to be eligible as the primary applicant?

- **No, we do not recommend allowing other entities besides municipal owners to be eligible as the primary applicant.** There are 58 counties in California containing over 480 municipalities and this is the first and only funding program available to support those agencies specific vehicle electrification infrastructure needs. Allowing special districts and non-government partners to be eligible for funding would further limit the small funding pot available.

How should streamlining affect eligibility or scoring?

- **We recommend use of streamlined status as a factor in scoring** to acknowledge agencies that have complied with state requirements established by AB 1236, and to incentivize compliance. Funding eligibility can serve as a powerful tool for staff at local agencies that may not otherwise prioritize AB 1236 compliance, where stricter enforcement mechanisms are absent.

Should applications score higher if chargers are made available to the public?

- **No, we think there's merit in a program that is limited to fleet only charging and does not prioritize public access as a part of the scoring criteria,** recognizing that many federal and state grant programs are available for public charging.
- As a full-service municipality with a fleet of more than 2,000 vehicles, conversion of our fleet requires investment in fleet-only chargers at dedicated corporation yards to ensure the continuity of critical services. This practice is necessary for the good stewardship of public taxpayer and ratepayer dollars. Shared public infrastructure where City employees must wait their turn while "on the clock" for delivering critical City services is unacceptable and could compromise public health and safety.
- Municipal charging does not need to provide charging access to deliver significant public benefit. Our vehicles service the community; cleaning the fleet fuel mix improves the air quality of the neighborhoods that we serve, which includes census tracts designated as the most disadvantaged in California.

Should we allow medium-duty vehicles to utilize project chargers if possible?

- **We advocate for medium-duty vehicles to be able to utilize project chargers.** As the Advanced Clean Fleets regulation takes affect in January 2024, our fleet will begin to rapidly transition medium- and heavy-duty vehicles to electric vehicles in compliance with the regulation. Having chargers that are limited to only certain fleet vehicles will prove to be an obstacle to efficient and effective use of our limited charging infrastructure.
- The distinction between light- and medium-duty vehicles is not always clear cut and it would create a logistical challenge to enforce light-duty only charging. For example, a standard Ford F-150 Lightning is classified as light-duty and a Ford F-150 Lightning with an extended battery pack is classified as medium-duty.

What DAC/LIC requirement will ensure maximum benefits to these communities?

- We commend the inclusion of a 50 percent disadvantaged and low-income community (DAC/LIC) requirement. Recognizing that large public fleets like ours greatly impact the air quality of historically under resourced neighborhoods, direct investment in fleet infrastructure ensures significant and rapid fleet conversion that benefit DAC's.
- **We recommend that charger locations be utilized as the metric for determining whether project chargers meet the DAC/LIC requirements, rather than communities served or eVMT.** Since eligible projects will require EV chargers to be installed at municipal fleet "home bases", all vehicle trips will start and end at the charger locations. Prioritizing DAC/LIC charger locations will ensure that localized air quality benefits are provided to the DAC/LIC neighborhoods that are receiving the greatest cumulative volume of fleet traffic.

Are the technical and operations requirements appropriate and feasible for municipal fleets?

- **Requiring 97% operations is not a feasible requirement.** The chargers up-time is often dependent on the electric vehicle supply equipment company's functionality of software and response time to issues. Even with a networking agreement, warranties, and a separate maintenance contract that requires 97% operations, our experience with existing chargers is that we do not consistently achieve 97% operations and do not have the power to enforce the requirement.
- **Providing toll-free telephone number for customer support is an unnecessary and inappropriate requirement for fleets.** For fleet only chargers that will primarily be behind gates, staff members utilizing fleet vehicles would be expected to follow internal facilities maintenance procedures to submit a work order to address charger operations and maintenance issues.

What data would be most useful to replicate these projects in the future?

- **The proposed "payment method" data collection requirement is not necessary for fleet vehicles.** Since chargers would typically be installed at dedicated corporation yards and only accessed by fleet vehicles, users will not pay to charge.

Is there anything missing from the proposed scoring criteria?

- **We think the Innovation scoring criteria is an unrealistic evaluation for municipal fleets,** which need charging infrastructure to ensure continuity of essential government services and must practice good stewardship of public funds. We propose that criteria such as demonstrated need, project feasibility, or project readiness be used for scoring instead of innovation.

Thank you in advance for consideration of our comments. We appreciate the Energy Commission's leadership in vehicle electrification, and for the collaborative approach to programming. If you have any further questions regarding the City's comments, please do not hesitate to contact Jennifer Venema, Climate Action Lead, at [jvenema@cityofsacramento.org](mailto:jvenema@cityofsacramento.org).

Sincerely,

Matt Eierman  
Public Works Director

**Signature:**  [Matthew Eierman, Director of Public Works \(Aug 3, 2023 17:55 PDT\)](#)

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