

**DOCKETED**

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**City of Fremont comments to Pre-Solicitation Proposal of Municipal Fleets EV Infrastructure Grant Opportunity**

*Additional submitted attachment is included below.*



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August 4, 2023

California Energy Commission  
715 P Street  
Sacramento, California 95814

RE: Docket No. 20-TRAN-04 - Comments on Municipal Fleets EV Infrastructure Project Funding

Dear California Energy Commission Staff:

The City of Fremont thanks you for this opportunity to provide comments on the proposed Municipal Fleets Electric Vehicle Infrastructure Project Funding opportunity. Over the past handful of years, Fremont has taken a leadership role in fleet electrification. In 2019, Fremont Police deployed its first fully electric-powered vehicle, a Tesla Model S 85, which is one of the first examples of an EV being used as a police pursuit vehicle. Details on this pilot project can be found at [www.fremontpolice.org/electricvehicle](http://www.fremontpolice.org/electricvehicle). In 2020/21, Fremont conducted a Municipal Fleet Electrification Study to analyze opportunities for electrification across its entire vehicle fleet. This study, funded through a Bay Area Air Quality Management District (BAAQMD) Climate Protection Grant, included an in-depth assessment of EV charging infrastructure needs and opportunities. Resources and best practices developed out of this study can be found here: <https://evfleet.tools/>. At present, the City has fifteen all-electric vehicles in its fleet consisting of police patrol cars, traffic enforcement motorcycles, and various sedans and maintenance vehicles. New acquisitions planned in the current fiscal year include the replacement of thirteen internal combustion trucks and three sedans with electric equivalents.

The City of Fremont is encouraged by the CEC's proposed Municipal Fleets EV Infrastructure Project Funding as it fills a much-needed gap in supporting the EV charging infrastructure necessary for light and medium duty fleet vehicles that largely make up municipal fleets. Many of the other regional, state, and federal funding opportunities the City is aware of have focused heavily on supporting electric transit and school buses, provided incentives only for heavy duty vehicle classes, and/or directed funding exclusively toward disadvantaged communities. Regarding the questions posed at the July 21, 2023 workshop, Fremont offers the following comments to the CEC:

Proposed Funding and Eligibility:

- *Eligibility of non-municipal fleet owners:* Fremont is a member agency of the East Bay Community Energy (EBCE) Joint Powers Authority (JPA). As a community choice aggregator, EBCE may have greater capacity in terms of the staff resources available for applying to and managing a grant for municipal EV infrastructure. In addition, EBCE may be able to achieve economies of scale when it comes to vendor and equipment costs and streamlining the installation process across multiple cities within its service area. Fremont would support the CEC enabling an agency such as EBCE to apply for funding on behalf of its member agencies.
- *Higher scoring for publicly accessible chargers:* Applications should not receive bonus points for making municipal chargers available to the public. Public charging is problematic for many reasons: many municipal fleet vehicles domicile behind locked gates, and chargers need to be available for the fleet at any given moment those vehicles may need to charge, especially for public safety vehicles. There is significant funding already available for publicly accessible chargers; this grant is unique in that it targets municipal fleets which are often housed in locations inaccessible to the public. Fremont requests that the CEC keep this program focused on municipal fleet charging only.

- *25% cap on DCFC:* The cap on the percentage of chargers that can be DC fast chargers (DCFC) for any applicant should either be raised from the proposed 25% cap to 50%, or eliminated entirely. DC fast charging is critical for public safety vehicles such as Police and Fire. While these fleets may not require all charging to be DCFC, at least a critical number of chargers must be DCFC to ensure that vehicles that might need to be deployed immediately will have sufficient charge. Limiting the amount of DCFC in an application may delay the electrification of these critical public safety vehicles.

Proposed DAC/LIC, Technical, and Operations Requirements:

- *50% DAC requirement:* Fremont supports the inclusion of strong DAC requirement for grants that directly serve community members who may have less access to resources or are otherwise disproportionately burdened. In the case of this funding opportunity, however, the grant is benefiting municipal, rather than public-facing, infrastructure. DAC requirements often make it difficult for an agency like Fremont to be competitive in funding solicitations. The CEC could consider asking questions in the application process on how the funding would support critical public services and/or serve frontline communities. In addition, the CEC could consider criteria beyond CalEnviroScreen in its identification of DACs. An example of a map that overlays various agencies' evaluation of disadvantaged/ frontline communities is BAAQMD's Regional Climate Action Planning Initiative's Frontline Communities Map, found here: <https://experience.arcgis.com/experience/5f5e4f704c744fba8289f2403f4c8074/>

Proposed Data Collection and Evaluation Criteria:

- *Data most useful for replication:* Since this funding opportunity is focused on municipal fleets, it would make sense to collect data related to specific vehicle use cases. Vehicles used by building inspection or code enforcement, for instance, will typically be deployed during standard work hours and may be assigned to one specific staff person. City pool cars, on the other hand, could be used at random by any staff for work-related trips, and their use can vary widely. Police patrol vehicles will be rotated in and out of duty based on officer shifts, and have the highest daily mileage rates. The data collected on the charging profiles of these different use cases may prove useful for developing policies and best practices around charging infrastructure needs, peak demand management, and types of charging needed for different fleet applications. One caveat is that the data related to police fleets may need to be scrubbed of identifiable information due to confidentiality concerns; it would behoove the CEC to understand the limitations of data collection and reporting specifically for police vehicles.
- *Innovation as part of the evaluation criteria:* Fremont supports innovation being included as part of the scoring criteria, and would like to see the CEC encourage creative solutions for charging, such as battery-backed boosted charging or off grid solar powered charging. Recently, Fremont collaborated with Prospect Silicon Valley to issue an open call for charging solutions for the Fremont Police Complex, which included some intriguing options from CA-based companies like Freewire, ElectricFish, and BEAM (EVArc), among others. These solutions may allow a facility to install charging without having to upgrade electric service capacity or install new transformers, which can be a time-consuming and costly process, and often is a prohibiting factor for many municipalities when considering adding EV infrastructure.

Other Considerations:

- *Electric service availability:* Utility service availability can make or break any of these projects. Fremont encourages the CEC to collaborate with the CPUC and the IOUs to raise awareness regarding this funding solicitation and to ensure that the IOUs will cooperate with applicants/grantees to provide the most current information quickly and transparently regarding the available power capacity at any of the proposed installation sites.

Sincerely,



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