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**Joint POU Comments on July 2023 Staff Pre-Solicitation Workshop  
for Municipal Fleets**

*Additional submitted attachment is included below.*



August 4, 2023 | Submitted electronically

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**

The Southern California Public Power Authority,<sup>1</sup> Northern California Power Agency,<sup>2</sup> and California Municipal Utilities Association<sup>3</sup> (collectively, the “Joint POUs”) appreciate the opportunity to provide comments on the July 21, 2023, Staff Pre-Solicitation Workshop for Municipal Fleets Electric Vehicle (EV) Infrastructure from the Clean Transportation Program (CTP) of the California Energy Commission (CEC).

Our organizations collectively represent California’s local publicly owned utilities (POUs), each of which is governed by a board of local officials and is accountable to the community it serves. The Joint POUs are committed to supporting the zero-emission vehicle (ZEV) transition of our Public Agency fleets, where feasible. The Joint POUs appreciate the opportunity to comment on the CEC’s proposal for a municipal fleet-focused solicitation to support installation of the charging infrastructure necessary for ZEV adoption by public agencies.

**Comments**

In response to the questions posed by the CEC staff at the workshop, the Joint POUs provide the following responses:

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<sup>1</sup> The Southern California Public Power Authority (SCPPA) is a not-for-profit joint powers agency formed in 1980 to facilitate joint power and transmission projects for its local publicly owned electric utility members. SCPPA consists of eleven municipal utilities and one irrigation district – the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside, and Vernon, and the Imperial Irrigation District – who collectively serve nearly five million people throughout Southern California.

<sup>2</sup> The Northern California Power Agency (NCPA) is a nonprofit California joint powers agency established in 1968 to construct and operate renewable and low-emitting generating facilities and assist in meeting the wholesale energy needs of its 16 members: the Cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara, Shasta Lake, and Ukiah, Plumas-Sierra Rural Electric Cooperative, Port of Oakland, San Francisco Bay Area Rapid Transit (BART), and Truckee Donner Public Utility District—collectively serving nearly 700,000 electric consumers in Central and Northern California.

<sup>3</sup> The California Municipal Utilities Association is a statewide organization of local public agencies in California that provide electricity and water service to California consumers. CMUA membership includes publicly owned electric utilities that operate electric distribution and transmission systems. In total, CMUA members provide approximately 25 percent of the electric load in California.



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

The Joint POUs encourage the CEC to expand eligibility to include fleets owned by municipalities as well as other local public agencies, such as special districts. To optimize the use of funding, the Joint POUs recommend that the CEC consider allowing funds to be used for necessary capacity upgrades in neighboring agencies. This approach will foster efficiency and collaboration, leading to more effective utilization of resources.

***How should streamlining affect eligibility or scoring?***

Not all government agencies issue permits for charger installation, and it would not be appropriate to include this as either a requirement or a preference in a solicitation open to more than municipalities.

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

No, there should be no preference for chargers that are made available to the public. Government fleets typically charge in secure areas, and the solicitation should not incentivize moving those chargers to public areas, which would make it more difficult for the fleet vehicles to utilize the chargers. However, higher scores might be considered when fast charging stations are made available to other municipalities, public agencies, or special districts via shared usage agreements or a shared depot, which would increase usage of the infrastructure.

***Is a 25% cap on DCFC appropriate?***

If there is a cap, the cap should be higher than 25%. Fast charging may be an important component for zero-emission vehicles that need to be dispatched several times a day, or vehicles that need to be dispatched for emergency response. If the CEC does include a cap, then fleets should be able to request an exception based on fleet composition and usage.

Considering space limitations and frequent vehicle usage, restricting Level 2 chargers is often impractical for numerous municipalities. Public works and emergency vehicles, which are major emitters, would greatly benefit from transitioning to electric, but due to their intensive use, DCFC is necessary. Therefore, we request an increase to at least 50% for DCFC to support this transition effectively.

***Should the CEC allow medium-duty vehicles to utilize project chargers if possible?***

Yes – any charging infrastructure installed for light-duty vehicles should be allowed to support medium-duty vehicles, as there can be similar vehicle types and charging needs. For example, Ford F-150



Lightnings are available in configurations that bring the GWVR over 8,500 lbs. Additionally, utilizing charging infrastructure for both light-duty and medium-duty vehicles could increase the uptake of the infrastructure.

Rural areas predominantly rely on medium-duty vehicles because of their versatile applications for various needs. Including medium-duty vehicles in the funding provisions would be highly beneficial for rural and disadvantaged communities, enabling them to make the most efficient use of the available funding resources.

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

- a. 50% of chargers installed must be in DAC/LIC***
- b. 50% of communities served must be DAC/LIC***
- c. 50% of eVMT must be in DAC/LIC***

A requirement to install 50% of chargers within a DAC/LIC is not tenable, as the location of fleet charging is not representative of the communities served or where the emissions will be reduced. Furthermore, fleets have little to no flexibility on where the fleet homebase location is and won't be able to prioritize DAC/LIC for the fleet-specific charging infrastructure. If there is a DAC/LIC requirement, then fleets should be able to show that they meet either b) or c), based on the data available, the usage of the vehicles, and the territories covered.

***How else can we ensure benefits to DAC/LIC?***

As an alternative to the above criteria for showing benefits to DAC/LIC, the CEC could offer additional funding amounts for chargers in those areas. In instances where the majority of fleet charging or operations are not in a DAC/LIC, this alternative would allow for participation, with potential for additional incentives for fleets that are located in a DAC/LIC.

To ensure consistency with other funding programs like CALeVIP, it is vital to standardize the determination process for DAC/LIC status. Currently, under CalEnviro, certain regions may become ineligible for funding, while CARB's California Climate Investments Priority Populations 2023 adopts a more inclusive approach by considering census tract data. Even if some census tracts do not qualify as LIC, they may still be eligible as Low-Income Households due to their proxy location. Implementing a more inclusive approach will help extend benefits to a broader range of disadvantaged and low-income communities.

***Are the technical and operations requirements appropriate and feasible for municipal fleets?  
Should we require chargers to be networked?***

Chargers should not be required to be networked. While there may be benefits to a fleet in having networked chargers to better track and control charging behaviors, there may also be a need to install non-networked chargers for reliability reasons. Many public agencies provide essential services and



emergency response, and need to ensure that chargers are available so that vehicles can be deployed when needed.

## **Conclusion**

The Joint POUs appreciate the opportunity to provide input on the concept of this municipal fleets EV infrastructure grant solicitation and are available to support any further questions.

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