

DOCKETED

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

Additional submitted attachment is included below.



London Breed, Mayor

Amanda Eaken, Chair
Stephanie Cajina, Vice Chair
Steve Heminger, Director

Fiona Hinze, Director
Lydia So, Director
Manny Yekutieli, Director

Jeffrey Tumlin, Director of Transportation

August 4, 2023

California Energy Commission Docket Unit, MS-4
715 P Street
Sacramento, California 95814

RE: Docket No. 20-TRAN-04 –Comments on July 2023 Staff Pre-Solicitation Workshop for Municipal Fleets

Dear California Energy Commission,

We, the San Francisco Municipal Transportation Agency, (SFMTA) 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.

The SFMTA designs, builds, operates, regulates and maintains one of the most comprehensive transportation networks in the world. The SFMTA manages on-and off-street public parking, facilitates bicycling and walking, regulates taxis, and manages paratransit services. The SFMTA operates five types of public transit in San Francisco (motor coach, trolley coach, light rail, historic streetcar, and cable car), and is the nation's eighth largest public transit system and the greenest in North America.

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 necessary utility capacity upgrades as this is often a major barrier to expansion of EV charging by public agencies.

Public Charger Accessibility: We advise AGAINST providing preferences for chargers that are made available to the public. The SFMTA, and most other public transit agencies, must secure our facilities for the safety of our workforce and the security of our fleets. The SFMTA strongly recommends that CEC should not score applications higher if they choose to make their chargers available to the public. Most fleets, including government light-duty (LD) fleets, domicile their vehicles at depots inaccessible to the public for safety, security, and operational reasons. It would be unsafe for a fleet to open their fleet depot to the public due to the danger of vehicle collisions. Additionally, security issues arise from unauthorized individuals being able to access fleet vehicles, if fleet depots are made accessible to the public. Finally, fleets must be able to



charge their vehicles at times that meet their operational needs, so if fleet chargers are open to the public, the fleet may not have access to its chargers when needed. Because most fleet operations cannot accommodate public accessibility, CEC should not score applications with public accessibility higher than applications that do not offer public accessibility. This will create a program that is more reflective of the actual operational needs of public sector fleets across the state.

Cap on DC fast chargers. The SFMTA respectfully requests that CEC eliminate the 25% cap for DC fast chargers from the program requirements. As was commented on during the Pre-Solicitation Workshop on July 21, 2023, DC chargers are essential for certain government fleet vehicles. Rather than establishing an arbitrary percentage cap for DC chargers for applicants, CEC should take into consideration the type and duty cycle of the government fleet vehicle involved in the application.

Medium-Duty Vehicle Inclusion The SFMTA agrees that CEC should allow grant-funded chargers to incidentally charge medium-duty vehicles as appropriate. Most public transit agencies have utility and maintenance vehicles that are a combination of light-, medium-, and heavy-duty vehicles and these vehicle types are all domiciled together at the same fleet depot.

If you require any further information, please contact me at 415-646-2623.

Sincerely,

A handwritten signature in cursive script that reads "Emily Heard".

Emily Heard, Manager
Funding Strategy & Programs