

DOCKETED

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CalETC Comments on Clean Transportation Plan Update

Additional submitted attachment is included below.



November 28, 2023

California Energy Commission
Re: Docket No. 23-ALT-01

Submitted via electronic commenting system for docket 23-ALT-01

Re: Revised Staff Draft Report: 2023-2024 Investment Plan Update for the Clean Transportation Program

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments in support of the Revised Staff Draft Report: 2023-2024 Investment Plan Update for the Clean Transportation Program (CTP). This letter is intended to largely support the direction the Revised Staff Draft Report establishes, as well as to provide more thorough feedback for consideration by Lead Commissioner Monahan and California Energy Commission (CEC) staff.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, the Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership also includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, autonomous electric vehicle fleet operators, and other industry leaders supporting transportation electrification.

On October 7, 2023, Governor Newsom signed AB 126, extending the CTP through July 1, 2035. AB 126 provides important guidance to the CEC by rightly focusing program investments on zero-emission technology projects, where feasible, and near-zero-emission projects elsewhere. CalETC strongly supports the language in AB 126 requiring that the CEC spend at least 50 percent of CTP funds in a way that directly benefits low-income Californians and members of disadvantaged communities. CalETC supports the staff recommendations in the Revised Draft Staff Report (“Staff Report”) as they adhere to these critical requirements.

CalETC supports the Staff Report’s focus on Low-Income and Disadvantaged Communities.

CalETC applauds the Staff Report’s goal of investing more than 50% of project funding to support projects that benefit low-income and disadvantaged communities. Residents of low-income and disadvantaged communities face additional challenges when seeking to switch to electric transportation, including, but not limited to, decreased access to charging, increased cost of charging when public charging is the only available option, and electric vehicle affordability. As such, it is critically important that the CTP focus funding allocations on these priority communities. CalETC also strongly supports the Staff Report’s recognition that “the location of a project is not

the only metric of whether a project will benefit low-income and disadvantaged communities.” Simply siting a project in a priority community does not mean that the chargers will be used by that community. Conversely, chargers for medium- and heavy-duty vehicles that are not sited directly in a priority community will provide a benefit to those communities by reducing truck traffic in the community. CalETC urges the CEC to continue to work with the Clean Transportation Program Advisory Committee, the Disadvantaged Community Advisory Group (DACAG), and interested and affected groups to define and track project benefits to increase program equity and inclusion.

CalETC supports the investments in light-duty charging infrastructure, including those focused on shared access, multi-unit dwellings, e-mobility, and other equity-related investments that act to expand EV access to all Californians. Light-duty investments facilitate the needed investments in medium- and heavy-duty vehicles and infrastructure, through technology transfer. CalETC strongly opposes any suggestion that there is an inherent choice between light-duty and medium- and heavy-duty charging infrastructure investments – both are necessary. CalETC supports investment in charging infrastructure for shared-access vehicles, including transportation network companies and e-mobility, as these cars typically drive many more miles than non-shared vehicles and act to increase both mobility and jobs in communities. Access to charging infrastructure specific to shared-use vehicles will increase zero-emission miles driven and benefit all drivers who need to access public charging by improving infrastructure availability and accessibility.

CalETC supports investments in medium-and-heavy-duty fueling technologies; it is essential these investments and the fueling stations be available prior to trucks being delivered to fleets and customers. Unlike light-duty electric cars where home charging is an available option in some cases, fleet operators require deployment of robust charging solutions before vehicle delivery. Consequently, the market requires substantial investments in charging infrastructure ahead of actual EV order placements to meet the targets set in the Advanced Clean Trucks and Advanced Clean Fleets rules.¹ Therefore, the public investment will need to consider anticipated demand and provide regulatory flexibility for managing associated risks to accommodate these investments.

In addition to ZEV trucks, battery electric school buses and transit buses provide huge potential to support grid reliability as well as emission reduction, when equipped with V2G capability. We support the CEC’s bidirectional charging and vehicle-grid integration initiatives, and it is important to make sure continuous funding is allocated for innovative charging solutions and technologies, to evolve and accommodate a variety of charging/fueling needs, applications, and use cases.

CalETC supports the proposed investments in ZEV manufacturing and workforce training and development. Previous Clean Transportation Program investments in ZEV manufacturing have been essential to creating and retaining good jobs in the industry, and more is needed. We do not

¹ Light-duty ZEV populations available here: <https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics/light-duty-vehicle>. Medium- and heavy-duty ZEV populations available here: <https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics/medium-and-heavy>.

comment at this time on whether the recommended investment is adequate, but one area of workforce development that should be emphasized is the workforce expansion needed to support substantial expansion of the electrical distribution grid. We recommend the Staff Report consider ways the state could bolster its secondary education system to address the need for additional electrical power engineers as well as electric utility distribution design staff. Both these critical skill sets are needed as soon as possible to meet ZEV infrastructure demands at scale. The timelines to get experienced power engineers in place takes a minimum of 6 years and distribution designers approximately 2 to 3 years. Therefore, it is imperative to accelerate workforce training immediately. CalETC is committed to working with the Lead Commissioner, CEC staff, and other Advisory Committee members to better understand the need and ensure adequate funding to overcome the inherent inequities in jobs creation that have existed for centuries.

Thank you for your consideration of our comments. Please do not hesitate to contact me laura@caletc.com should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura Renger', with a long horizontal line extending to the right.

Laura Renger, Executive Director
California Electric Transportation Coalition