

<b>DOCKETED</b>	
<b>Docket Number:</b>	24-TRAN-01
<b>Project Title:</b>	Technical Assistance for Clean Transportation Projects
<b>TN #:</b>	255782
<b>Document Title:</b>	Momentum Comments - Momentum's Comments on ZEV Infrastructure Grant Application TA Funding
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Momentum
<b>Submitter Role:</b>	Applicant
<b>Submission Date:</b>	4/18/2024 10:50:28 AM
<b>Docketed Date:</b>	4/18/2024

*Comment Received From: Momentum  
Submitted On: 4/18/2024  
Docket Number: 24-TRAN-01*

**Momentum's Comments on ZEV Infrastructure Grant Application  
TA Funding**

*Additional submitted attachment is included below.*

April 18, 2024

Hannon Rasool, Director  
Fuels and Transportation Division  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

**Subject: 24-TRAN-01: Technical Assistance for Clean Transportation Projects**

Dear Mr. Rasool,

Thank you for the opportunity to provide input to the California Energy Commission (CEC) regarding Technical Assistance (TA) support for local communities to prepare and apply for future rounds of Clean Transportation Program (CTP) funding, Charging and Fueling Infrastructure (CFI) program funding as well as other zero-emission vehicle (ZEV) related state and federal funding opportunities. Under-resourced communities often lack awareness, organizational capacity, and relationships necessary to secure and leverage public funding. A robust TA program could help level the playing field for under-resourced communities and increase equitable outcomes stemming from state and federal investments.

Since 2005, Momentum has helped raise \$5B+ in grants, loans, and other public incentives for projects valued at more than \$11B. We have worked closely with hundreds of clients, partners, consultants, and agency personnel from: public agencies, utilities, technology vendors, manufacturers, and project developers. Our team of scientists, engineers, finance and fund development professionals, commercialization experts, project managers, and administrators are committed to clarity of thought, client education, data-driven analysis, partnership development, and excellence in presentation. We conduct research, analysis, and strategic engagement to increase our clients' ability to access and manage public and private investment.

We have helped communities successfully secure and implement ZEV funding projects by prioritizing meaningful engagement, education, and quality of work. Our top priorities when working with communities are to 1) gather a foundational understanding of a community's ZEV goals, project pipeline and public funding objectives, 2) comprehensively identify strategically aligned grant and funding opportunities, 3) ensure that the community develops the most compelling proposals possible, 4) identify the risks, opportunities, and resources to develop competitive application materials prior to deciding on the investment of time and resources, 5) maintain an impeccable record of compliance to grant terms and conditions, and 6) support community's leadership position with funders by delivering strategic ZEV projects while enhancing community equity and eliminating fossil fuel emissions. We are pleased to provide input on the CEC's TA program structure to promote desired outcomes of supporting communities that have not historically received similar funding, achieving more equitable distribution of clean air benefits in the process.

## Determining the TA Program Structure

There is no one-size-fits-all approach to TA for under-resourced communities. Each community is unique, and their TA support needs will be unique. The key to a successful TA program is to meet communities where they are and cater the TA offering to their unique circumstances. Some communities may have sufficient resources or a shovel-ready project, but lack awareness of available ZEV funding and how to best position their projects for success. Other communities may lack resources all together and require full application and implementation support. The CEC should support communities at both ends of the spectrum through a menu of services including capacity building, application assistance, and implementation assistance. It is worth noting that implementation assistance may be an eligible expense of some grant awards.

## Selecting a TA Provider

Providers should be selected based on their demonstrated history of delivering successful TA for winning state and federal ZEV funding applications. Providers should be deeply experienced across the full proposal development life cycle which starts well before a grant solicitation opens. Providers should be deeply experienced in the following:

- **Needs Assessment:** Developing a deep understanding of the unique ZEV project needs through community-based needs assessments. Identifying existing resources, project pipeline, and partnerships.
- **Gap Analysis:** Identifying gaps between community-based needs assessment, the community's project pipeline and partnerships, and provide guidance on ways to fill gaps in advance of state and federal funding opportunity announcements (e.g., establish workforce development program).
- **Grant Forecasting and Evaluation:** Building awareness of open and upcoming ZEV funding opportunities. Educating community on eligibility criteria, risks, and resources required to develop a competitive application prior to deciding on the investment of time and resources.
- **Application Preparation:** Modular approach to application preparation ranging from guidance and support to turnkey proposal and supporting document development.
- **Technical Expertise:** In-house technical experts and close network of supportive technical experts.
- **Budgeting and Financial Planning:** Demonstrated experience developing and implementing state and federal ZEV grant budgets.
- **Community Engagement:** Demonstrated experience developing, facilitating, and implementing community engagement, community benefit plans. Close network of community-based organizations (CBOs) to supplement community's lacking active CBOs.
- **Capacity Building:** Demonstrated experience training applicants to develop and implement their own state and federally funded ZEV projects.
- **Alternative incentives:** Demonstrated experience with other available sources of funding or financing for EV charging infrastructure, such as the IRA Alternative Fuel Vehicle Refueling Property Credit, and California's Low Carbon Fuel Standard.

Securing grant funding for ZEV projects is incredibly exciting. However, many projects fall short of delivering their projected benefits. Deploying new ZEV technology in under-resourced communities can be challenging in and of itself. Common issues include undefined permitting processes, lack of skilled labor, and insufficient site host interest. The addition of grant funding terms and conditions and administrative requirements adds another layer of complexity that may exacerbate project implementation challenges. Providers should also be selected based on their demonstrated history navigating project deployment and grant administration challenges. Emphasis on experience supporting successfully completed projects should be prioritized. This should include impeccable records of compliance, reporting, and auditing for the Provider and their clients.

### **Prioritizing TA Recipients**

It is important to consider the targeted funding sources when prioritizing TA recipients. The first round of the CFI program received over 600 applications for funding. Many of the applications that were not selected may be resubmitted. With more than a year to refine projects and partnerships subsequent rounds of CFI are poised to be incredibly competitive and place an elevated level of emphasis on project readiness. Another consideration is the makeup of California's CFI awardees. Most awardees were Air Districts, Counties, and Transit Authorities. These agencies possess robust grant writing and implementation resources. Under-resourced communities are disadvantaged by a lack of awareness, internal resources, and advanced preparation.

The CEC's TA recipient prioritization should consider the competitive nature of the CFI program, the resource needs of under-resourced communities, and the TA support that will be required to help these communities be successful. The CEC should focus on the quality of the support rather than the quantity. Full-service, turnkey proposal development and project implementation may be warranted to establish competitive projects. With limited TA funding, communities with the greatest need should be prioritized. However, need should be balanced with some degree of project readiness when considering the competitive nature of CFI and CTP opportunities. Project readiness could be demonstrated through community engagement and support from interested site hosts and developers willing to support the development of the project if funded.

### **Measuring Success**

- Successful Technical Assistance

In the previous section, we explored the inherently competitive landscape of federal funding opportunities. Consequently, it may not be prudent to measure the success of the TA provided solely on grant funding wins. A more strategic approach may involve defining success in terms of the gaps identified through onboarding and gap analysis and the recommended solutions proposed and supported by the TA Provider to bridge the gaps.

- Successful Capacity Building

Capacity Building Activities ought to encompass an evaluation of the learnings acquired. A critical indicator of the success of these activities should be the growth of knowledge and capabilities within the communities supported. Surveys could be conducted before and after capacity building initiatives to gauge effectiveness. A qualitative assessment of the establishment or enhancement of subject matter experts within the communities could also be considered.

Another metric of success for the Capacity Building Activities that the CEC should contemplate is the development of a comprehensive roadmap or blueprint that details the activities the organization will move forward with. This document should detail the forthcoming steps necessary to attain project readiness, alongside fostering organizational comprehension of the specific roles and responsibilities and next steps necessary to attain project readiness, alongside fostering an organizational understanding each team member will assume in the process of compiling a grant application.

### **Funding Levels**

The CEC's initial TA program should provide a more comprehensive approach to supporting communities considering the competitive nature of CFI and CTP. While this will lead to supporting fewer communities, it will promote higher chances of success in attracting more federal and private investment to the state. There should be a robust data collection plan to identify the most impactful TA services, capture lessons learned and develop best practices that can inform and more replicable and scalable approach for future TA support opportunities.

Thanks again for the opportunity to provide comments on the CEC's Technical Assistance for Clean Transportation Projects efforts. We appreciate your consideration of our suggestions and look forward to working with the CEC to achieve the state's goal of attracting state and federal ZEV funding to communities that have not historically received similar funding. If you have any questions, please feel free to contact me at [dedrick@buildmomentum.io](mailto:dedrick@buildmomentum.io).

Sincerely,

Dedrick Roper

Director, ZEV Transition