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June 7, 2024 Public Meeting of the Advisory Committee for the Clean Transportation Program Investment Plan

Additional submitted attachment is included below.



June 21, 2024

California Energy Commission Re: Docket No. 24-ALT-01

Submitted electronically to https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=24-ALT-01

Re: June 7, 2024 Public Meeting of the Advisory Committee for the Clean Transportation Program Investment Plan

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the June 7 Public Meeting of the Advisory Committee for the Clean Transportation Program Investment Plan (Advisory Committee Meeting). CalETC would like to thank the CEC for all your hard work on developing the draft 2024-2025 Investment Plan Update for the Clean Transportation Program ("2024-2025 Investment Plan Update") and for hosting the Advisory Committee Meeting.

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, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership 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.

CalETC largely supports the CEC's recommendations contained in the 2024-2025 Investment Plan Update. We strongly support the CEC's focus on funding in disadvantaged and low-income communities, and we applaud the fact that 73% of funding through July 2023 was allocated to statewide programs, disadvantaged communities, low-income communities, and communities that are both low-income and disadvantaged. With regard to the proposed funding allocations for the 2024-2025 fiscal year, we support the allocation of base funds as proposed: \$37 million for light-duty charging infrastructure, \$55.2 million for medium-and-heavy-duty infrastructure, and \$3.0 million for workforce training and development.

CalETC understands that uncertainty regarding funding from the state budget complicates the CEC's planning process and we appreciate the CEC's efforts to clearly allocate funding from the Clean Transportation Program funds reauthorized by AB 126 (2023). That said, we are also very concerned about the "start/stop" of some infrastructure incentive funding programs as this leads to market uncertainty for both investors and charging station providers at a time when we need to

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rapidly accelerate construction and energization of new electric vehicle charging stations. For example, it is our understanding that for the remainder of this year, neither CALeVIP nor Communities in Charge will be open for DCFC block grant awards. This is a concerning departure from the approximately six years of relatively stable and predictable funding schedules for CALeVIP funding, and CaleTC strongly urges the CEC to provide clear, long-term schedules for workshops and solicitations for your signature block grant programs. Without clarity on the timing of future funding opportunities it will be very difficult to meet our shared EV infrastructure goals.

Finally, CalETC urges the CEC to consider funding for Level 1 EV charging in appropriate use cases, such as some apartment buildings and workplaces. Level 1 can be a very convenient charging option for customers when there is sufficient parking to allow the customer to charge for long periods of time. Additionally, Level 1 charging is inexpensive as compared to faster charging. As discussed during the Advisory Committee Meeting, Level 2 chargers cost approximately \$10,000 per charger, whereas Level 1 charger are approximately \$2,500 per charger. For these reasons, we encourage you to consider Level 1 chargers as eligible for funding under Clean Transportation Program Investment Plan.

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

Kind regards,

Laura Renger, Executive Director

California Electric Transportation Coalition