

**DOCKETED**

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*Comment Received From: California Transit Association  
Submitted On: 6/21/2024  
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## **California Transit Association - CTP Draft Plan - Letter**

The California Transit Association's letter is attached here.

*Additional submitted attachment is included below.*

June 21, 2024

California Energy Commission  
Docket No. 24-ALT-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

California Energy Commission:

On behalf of the California Transit Association, I write to you today in response to the release of the **2024-2025 Investment Plan Update for the Clean Transportation Program (Draft Staff Report)**. As a statewide association representing more than 85 transit agencies in state, we greatly appreciate your continued attention to our industry’s funding priorities and your clearly articulated commitment to assisting transit agencies in their transition to zero-emission vehicle technologies, regardless of the fuel path they choose.

The comments that follow restate the feedback we provided to you at the Advisory Committee meeting on June 7, 2024.

### **Proposed Funding Level for Medium- and Heavy-Duty Infrastructure, Investment Priorities**

As drafted, the Plan proposes to invest \$55.2 million in “Medium- and Heavy-Duty Infrastructure” in FY 2024-25, roughly 60% of available base funding for the upcoming fiscal year. At the highest level, we support this investment split between “Medium- and Heavy-Duty Infrastructure” and “Light-Duty Charging Infrastructure.”

We understand fully that, as the Plan is finalized and adopted by the Commission later this year, CEC staff will work with stakeholders – as it has done in previous years – to suballocate funding approved for “Medium- and Heavy-Duty Infrastructure” to various programs and projects. Several of these programs and projects may support the buildout of charging and refueling infrastructure by California’s transit agencies. That said, given the limited funding available to the CEC in this Plan and the budget uncertainty we face in future years, we believe it is imperative that CEC identify how this funding will be used – at the very least, conceptually – prior to the Plan’s adoption, so that stakeholders can inform the CEC’s investment strategy. Without such early action, it is difficult to provide the CEC with further

informed perspective on whether the Plan strikes the right balance of investments across industries.

As we make this request, we will continue to advocate that the CEC direct investment under “Medium- and Heavy-Duty Infrastructure” to the deployment of zero-emission transit vehicles that support compliance with the California Air Resources Board’s Innovative Clean Transit regulation. Additionally, as CEC receives funding for Emerging Opportunities in FY 2025-26, we encourage CEC to direct investment under this category to infrastructure for zero-emission locomotives and ferries that support transit agencies’ compliance with CARB’s In-Use Locomotive Regulation and Commercial Harborcraft Regulation.

Finally, we strongly encourage you to continue to refine the process of applying for funding, particularly for transit agencies and small fleet owners that may not have the staff resources to navigate the current grant solicitation process, including through utilization of first-come/first-serve block grant programs, like [EnergIIZE Commercial Vehicles project](#)

In closing, we appreciate the opportunity register these comments and for our seat on the Advisory Committee for the Clean Transportation Program. We look forward to continuing to engage with you, your staff and your partner agencies, to further the state’s goals of widespread transportation electrification.

Please feel free to contact me at 916- 446-4656 x1034, if you have any questions about the recommendations provided in this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Pimentel". The signature is fluid and cursive, with a large initial "M" and "P".

Michael Pimentel  
Executive Director