

DOCKETED

Docket Number:	24-ALT-01
Project Title:	2024–2025 Investment Plan Update for the Clean Transportation Program
TN #:	257323
Document Title:	Catalina Gonzalez Comments - Center Equity in CTP Investments
Description:	N/A
Filer:	System
Organization:	Catalina Gonzalez
Submitter Role:	Public
Submission Date:	6/21/2024 5:09:51 PM
Docketed Date:	6/21/2024

*Comment Received From: Catalina Gonzalez
Submitted On: 6/21/2024
Docket Number: 24-ALT-01*

Center Equity in CTP Investments

Additional submitted attachment is included below.



June 21st, 2024

Commissioner Patricia Monahan
California Energy Commission
1516 Ninth Street Sacramento, CA 95814

Re: Docket: 24-ALT-01 Draft Staff Report on 2024-2025 Investment Plan Update for the Clean Transportation Program

The Center for Progressive Reform is thankful for the opportunity to offer comments on the draft staff report for the CTP Investment Program. The Center is a non-profit research and advocacy organization focused on addressing social challenges and the concerns of historically marginalized communities by centering racial and economic justice in climate policy.

Our comments are informed by our [set of reports](#) on California's Funding Programs, in which we provide deeper analysis and recommendations for more effectively directing funding for clean energy programs to historically marginalized communities most in need to help meet our state's climate goals while also advancing equity, and ensuring a just transition to a clean energy future. Based on this analysis, which is informed by community leaders, advocates, and practitioners, we recommend the following general principles:

- Center income and racial equity, prioritizing benefits for those most in need.
- Develop an integrated vision and plan that knits together fragmented programs and funding streams.
- Develop holistic, multi-sector strategies that recognize interconnected needs and provide multiple benefits that uplift historically overburdened and underserved communities.
- Prioritize community-scale funding over individual handouts to enable community-driven planning that fosters widespread participation and self-determination.

We support the balance and general direction of staff's funding proposal and the emphasis on improving reliability and the user experience with charging infrastructure. Recognizing that marginalized communities in California continue to face many barriers to accessing these technologies, we applaud the staff for their work in successfully allocating over 50 percent of previous programs' funds to low-income and disadvantaged communities.

We are especially supportive of the use of block grants as an effective mechanism to make funds more accessible to communities over individual competitive solicitations. However, we urge the commission to prioritize and expand the availability of block grants to community-based organizations for locally planned projects that provide economic opportunities and multi-benefits to communities most in need.

In addition to this, we also offer the following recommendations related to Light Duty, Medium, and Heavy Duty vehicles:

- Direct incentives for light-duty vehicles to low-income households and customers
- Prioritize investments in MDHD vehicles for high-pollution corridors and ports.
- Explore opportunities for more workplace charging.
- Provide direct investments for MD and HD to public transit agencies, and rural transit agencies.
- Require the use of the latest dynamic charging technology to help ensure affordability
- Keep program costs down by reducing duplication of efforts within CEC and by facilitating interagency collaboration.
- Include more detail about federal funding solicitations that can help supplement these investments.

Finally, we also offer the following recommendations to help further center equity in the Clean Transportation Program:

- Provide the analysis of how many charging stations in low-income rural and disadvantaged communities are in operation or need repair to make it easier to target funding to these communities.
- Avoid the first-come first-served incentive model that favors more resourced communities and households.
- Increase public awareness and education about available funding and lower-cost charging options.

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