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Docket Number:	24-ALT-01
Project Title:	2024–2025 Investment Plan Update for the Clean Transportation Program
TN #:	257401
Document Title:	City of San Jose Comments on the 2024–2025 Investment Plan Update for the Clean Transportation Program
Description:	N/A
Filer:	System
Organization:	David Tran
Submitter Role:	Public Agency
Submission Date:	6/25/2024 10:01:37 AM
Docketed Date:	6/25/2024

*Comment Received From: David Tran
Submitted On: 6/25/2024
Docket Number: 24-ALT-01*

City of San Jose - Comments on the 2024â€“2025 Investment Plan Update for the Clean Transportation Program

Dear Commissioners,

On behalf of the City of San Jose's Department of Transportation, I would like to express our appreciation at the opportunity to comment on the proposed 2024â€“2025 Investment Plan Update for the Clean Transportation Program. In response to the proposed Investment Plan for light-duty incentive programs, we offer the following comments:

1. Develop more flexible funding guidelines for EV infrastructure projects at MFH and expand funding to facilitate workplace charging.

Multi-family residents and owners of multi-family developments face significant barriers to install EV chargers accessible to all tenants, especially considering the type of electrical upgrades and operational costs required to meet all the network/connectivity, public access, and equipment/technology requirements attached to public funding. In San Jose, some of these costs may be offset for new construction through updated codes intended to facilitate EVSE installations. However, these policy developments do not affect the majority of existing multi-family housing in the City, where these projects typically entail complex and expensive electrical upgrades. In addition, there is significant home-sharing in San Jose (e.g., multi-generational families living in single family homes and owning multiple vehicles). In addition to easing equipment and network/connectivity requirements to make these projects more affordable for MFH, the proposed investment plan could incorporate additional funding for workplace charging, which may be more convenient and less expensive for multi-family residents in the short-term.

2. Consider keeping and expanding eligible expenses for light-duty programs accessible to public agencies.

We encourage the CEC to keep eligibility of project expenses for light-duty EV programs to include design, engineering, and labor expenses for public agency applicants. Furthermore, we welcome expanding eligible expenses to cover electric service upgrades to retrofit existing facilities that serve underserved communities, especially those serving MF residents. The City of San Jose already faces significant barriers to install chargers at city-owned facilities accessible to the public, in part because of the high costs associated with the electrical and engineering upgrades necessary to support EV charging at publicly accessible sites. Further limiting eligible expenses under these programs would significantly increase the barriers for public agencies to participate in the programs.

3. Consider maintaining a flexible funding structure to facilitate participation for public

agencies in light-duty programs.

We encourage the CEC to consider making available staggered funding from the start and midway point of a project for public agencies, non-profits, and smaller property owners, as they may not have the upfront capital to participate in the programs. While delayed reimbursements may be a non-issue for companies, it may dissuade public agencies to apply to the program.

We value the opportunity to provide feedback on these programs and appreciate the efforts by the CEC to help expand availability of EV charging, especially for underserved communities. please do not hesitate to contact Andrea Arjona Amador, Climate Smart & Electric Mobility Lead, for any questions regarding our comments at andrea.arjonaamador@sanjoseca.gov.

Thank you!

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