

**DOCKETED**

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**Antelope Valley Transit Authority Comments on the MDHD  
Infrastructure Concepts**

*Additional submitted attachment is included below.*



July 30, 2024

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Ms. Michelle Vater  
Supervisor, Freight and Transit Unit  
California Energy Commission  
715 P Street  
Sacramento, California 95814

**Re: Antelope Valley Transit Authority Comments on the MDHD Infrastructure Concepts**

Dear Ms. Vater and CEC staff,

Antelope Valley Transit Authority (AVTA) appreciates the opportunity to comment on the California Energy Commission’s (CEC) proposed solicitation concepts for Medium and Heavy-Duty (MDHD) Zero-Emission Vehicle Infrastructure projects. We applaud CEC’s work in developing these multifaceted approaches to advance the buildout of California’s currently nascent MDHD charging infrastructure. We firmly believe that funding from the Clean Transportation Program (CTP) is crucial for promoting the adoption of larger class zero-emission vehicles and advancing California’s ambitious climate goals.

**Areas for Improvement in the Application Process**

As the first and only agency in North America to operate a fully electric transit fleet, and as leaders in clean technology transformation, AVTA is committed to meeting our shared climate goals and improving public health, especially in our most impacted communities. To this end, we must streamline the State application process to expedite funding for the most qualified and impactful projects. The current process for submitting applications to programs like CTP is highly complex, and creates barriers for applicants with limited resources, and ultimately impedes progress towards transitioning to MDHD fleets. We at AVTA have some concepts that can improve the submission process for all parties, and in turn advance our mission of rapidly building a cleaner, more sustainable transportation sector.

**1. Technical Assistance Support:** We have observed the CEC grant process has a notable lack of technical assistance, often leaving applicants with unanswered questions. While we understand the aim of grant applicant evaluators wanting to maintain a level playing field, we recommend CEC offer third-party technical assistance support. Similar initiatives by CARB have proven highly effective in addressing applicant queries and ensuring smoother and more robust application submissions.

**2. Consistency Among CEC Programs:** To reduce administrative burdens and streamline the application process, we urge the CEC to work towards greater consistency across its various EV infrastructure funding programs. Aligning application requirements and evaluation criteria where possible will simplify compliance for applicants and enhance the overall efficiency of the funding process.

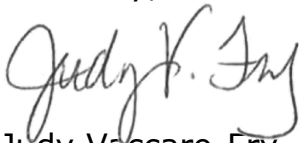
**3. Incentivizing Higher Matching Contributions:** To maximize the impact of CEC funding, we propose introducing a scoring incentive for applicants who commit a higher percentage of their own funds. Specifically, we suggest awarding additional points for commitments that exceed the standard 25% match. This approach would encourage applicants to leverage more of their own resources, thereby stretching the funding further and increasing overall program effectiveness.

**4. Scoring Based on Control Over Timelines:** Recent applications to the CEC have placed significant emphasis on detailed project timelines covering permitting, construction, energization, and project completion. While we understand the CEC's need for assurances regarding timely project completion, we respectfully disagree that a detailed construction plan demonstrates a grantee's capability to execute effectively. The reality is that most grantees determine their construction timelines only after awarding contracts to engineering and construction firms. Therefore, detailed construction timelines provided during the grant application stage are largely speculative. We suggest that the CEC revise its scoring criteria to focus on factors directly within the grantee's control. For instance, emphasis could be placed on the grantee's track record of successful project implementations, experience in managing construction solicitations, project management capabilities, administrative oversight of construction projects, and other factors such as the efficiency in issuing Requests for Proposals (RFPs) and meeting preparatory requirements. This adjustment would ensure a more equitable evaluation process that accurately reflects the grantee's actual capabilities.

## Importance of Public Stakeholder Process

We believe these recommendations will not only enhance the fairness and efficiency of the CTP program but also better support the achievement of California's clean transportation goals. We want to share our appreciation for this open and transparent process as well as reiterate our recognition of the hard work CEC staff has put into these MDHD solicitation concepts. We value the opportunity provided to voice our support for this program and to put forward ways to improve it as well. Please do not hesitate to contact me should you have questions or wish to discuss further.

Sincerely,



Judy Vaccaro-Fry, MBM, MPA  
Chief Financial Officer  
Antelope Valley Transit Authority