

**DOCKETED**

<b>Docket Number:</b>	24-ALT-01
<b>Project Title:</b>	2024–2025 Investment Plan Update for the Clean Transportation Program
<b>TN #:</b>	259635
<b>Document Title:</b>	Coalition for Clean Air Comments - CCA comments on Revised Staff Draft Report - 2024–2025 Investment Plan Update for the Clean Transportation Program
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Coalition for Clean Air
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	10/22/2024 10:41:37 AM
<b>Docketed Date:</b>	10/22/2024

*Comment Received From: Coalition for Clean Air  
Submitted On: 10/22/2024  
Docket Number: 24-ALT-01*

**CCA comments on Revised Staff Draft Report - 2024â€™2025  
Investment Plan Update for the Clean Transportation Program**

*Additional submitted attachment is included below.*



October 22, 2024

The Honorable Patricia Monahan  
California Energy Commission  
1516 Ninth Street Sacramento, CA 95814  
Docket #: 24-ALT-01

**Re: Revised Staff Draft Report - 2024–2025 Investment Plan Update for the Clean Transportation Program**

Dear Commissioner Monahan,

The Coalition for Clean Air strongly supported the CTP’s reauthorization through last year’s AB 126 (Reyes), particularly its equity requirements. We appreciate the work that went into the revised draft staff report and the Advisory Committee meeting, and we agree with the proposed allocations, with one amendment.

We especially support the emphasis on funding infrastructure for zero-emission medium and heavy-duty vehicles like trucks and buses. Replacing diesel engines that inflict toxic exhaust on our communities with engines that generate no tailpipe pollution is an urgent priority, especially for our low-income communities of color. As demonstrated by *Figure 1: Disparities in Transportation-Related Pollution Exposure by Race and Income*, California’s Black, Asian-American and Latino communities are burdened by much greater diesel particulate matter than are our White communities. CEC’s investments in ZE infrastructure complement the regulatory structure established by CARB to clean up diesel pollution, and expediting that infrastructure deployment is vital to the success of the zero-emission transition. Therefore, we support the balance struck by the funding proposal, and we commend CEC for its commitment to meeting and exceeding the minimum percentages established by AB 126 for investments in and benefitting disadvantaged and low-income communities.

Fuel-cell electric vehicles may play an important role in medium and heavy-duty transportation, so we believe that public investment in hydrogen fuel should go toward stations that can supply trucks and buses. The market has not shown confidence in light-duty hydrogen; despite CEC’s massive investment of over \$230 million, we have only 62 retail stations open, and about 30 percent of them were nonoperational for 30 days or more as of September. For these reasons, **CEC should restrict the proposed allocation of \$15 million for hydrogen refueling to medium and heavy-duty vehicle hydrogen infrastructure.**

When it comes to charging for light-duty vehicles, we urge CEC to prioritize aid to low-income households, especially those living in multi-unit dwellings. For those who have on-site parking and do not have lengthy commutes, Level 1 charging is a low-cost option that should be

supported without burdensome restrictions. For those low-income residents without on-site parking, Level 2 or DC fast charging should be made available at costs comparable to those paid by inhabitants of single-family housing.

In addition to the investments proposed by the draft staff report, CEC has a crucial regulatory role to play in cleaning up transportation, the biggest source of air and climate pollution in our state.

- **ZE Infrastructure Reliability:** For transportation electrification to succeed, the refueling experience must be dependable and convenient. Drivers should be able to approach a public charging (or hydrogen) station – especially one that has been built with public funds -- with the same confidence with which they would drive into a gas station. Unfortunately, this is not always the case at present. Therefore, we support CEC's *Proposed Regulations for Electric Vehicle Charger Inventory, Utilization, and Reliability Reporting*, and look forward to seeing them adopted by the Commission soon.
- **Replacement Tire Efficiency:** Currently, almost all new cars are equipped with low rolling resistance tires that boost each new car's efficiency and reduce emissions. However, when California consumers go to purchase replacement tires for their cars, they are unaware that almost all replacement tires sold throughout the state are not low-rolling resistance tires. As a result, once they replace their car's tires, they are unknowingly spending more money on fuel, whether it be gasoline, electricity or hydrogen, and increasing the amount of pollution that is caused by their vehicle.

CEC should adopt its proposed Replacement Tire Efficiency Program, a first-in-the-nation tire fuel efficiency standard for passenger vehicle replacement tires sold in California that aligns with the tires sold with new cars, along with consumer outreach and education at the point of sale so California drivers can easily compare tire efficiency, safety, and other attributes.

I look forward to continuing to collaborate on CEC investments and regulations.

Respectfully,



Bill Magavern  
Policy Director