

DOCKETED

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Project Title:	2024–2025 Investment Plan Update for the Clean Transportation Program
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Filer:	Leigh Kammerich
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RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

October 22, 2024

California Energy Commission
Docket Unit
Docket No. 24-ALT-01
715 P Street
Sacramento, CA 95814

RE: Comments on Revised Staff Report, 2024-2025 Investment Plan Update for the Clean Transportation Program

Electronically Submitted to Docket No. 24-ALT-01

Dear Commissioners:

On behalf of the Rural County Representatives of California (RCRC), I am pleased to provide comments on the 2024-2025 Investment Plan Update for the Clean Transportation Program. RCRC is an association of forty rural California counties, and the RCRC Board of Directors is comprised of elected supervisors from each member county.

We commend the California Energy Commission (CEC) for its ongoing desire to strategically deploy clean transportation investments to ensure an equitable transition to meeting California's zero-emission transportation goals. While key findings and ongoing assessments (per Senate Bill 1000 reports) suggest there are disproportionate public charging opportunities for rural and disadvantaged communities, the 2024-25 Investment Plan Update lacks a specific strategy to resolve geographic and low-income inequities and make greater funding commitments for rural inclusion.

Given that competitive funding processes can disadvantage under-resourced jurisdictions, the CEC should consider funding set-asides to achieve geographic equity and improve access to zero-emission vehicle (ZEV) infrastructure in rural areas and corridors. This is especially important given the lack of effective outreach to rural jurisdictions. Without proactive engagement, many areas of the state are unable to adequately prepare for funding opportunities. Additionally, certain criteria for siting locations can be overly rigorous and should give the flexibility to meet the intent of program and facilitate rural needs. For example, the CALeVIP's emphasis on shovel readiness continues to disenfranchise unprofitable, high-cost areas and/or those without

1215 K Street, Suite 1650, Sacramento, CA 95814 | www.rcrcnet.org | 916.447.4806 | Fax: 916.448.3154

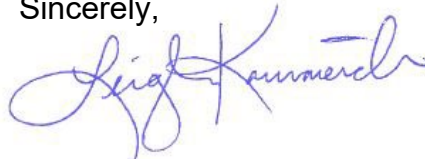
a sufficient workforce. We applaud the Commission's forthcoming ZEV Technical Assistance program that may provide critical support to accelerate deployment of ZEV infrastructure.

Hydrogen fueling infrastructure and medium- and heavy-duty ZEV infrastructure are challenging market segments that continue to require greater support. While the 2024-25 Investment Plan Update makes considerable strides in supporting these needs, RCRC requests continued support of the regulated community under the California Air Resources Board (CARB) Advanced Clean Fleets (ACF) rules. Hydrogen fuel-cell electric vehicle options are particularly promising to meet the needs of medium- and heavy-duty fleet vehicle classes. The Clean Transportation Program has the opportunity to balance the multitude of infrastructure needs and options to meet air quality goals through greater coordination and response to costly regulations imposed by other state agencies, including CARB.

We understand the significant investments required for a safe, reliable electric grid and the substantial burden it places on ratepayers to increase the capacity to meet increased demand. Recognizing the CEC's desire to promote bidirectional charging and vehicle-grid integration as a potential solution does not, unfortunately, address core transmission and distribution needs to meet greater electrification demands and inappropriately shifts the operational responsibilities from utilities to consumers—particularly those in vulnerable communities. When, for instance, severe storms, wildfires or natural disasters cause prolonged power outages, the ability of residents to prepare for and weather such outages may be greatly diminished and ultimately impact successful evacuation efforts if bidirectional charging is powering homes or devices, without enough charge to reach a safer location. We urge the CEC to collaborate with state emergency management officials to ensure public safety is the main priority before implementing any vehicle-grid management solutions, especially during dangerous conditions.

Rural communities continue to face enormous challenges to make such a transformational shift in clean transportation alternatives and we appreciate the CEC's recognition of existing gaps in available infrastructure in rural regions. Thank you for your consideration of our comments. Please do not hesitate to contact me at lkammerich@rcrcnet.org should you have any questions.

Sincerely,



LEIGH KAMMERICH
Policy Advocate