

DOCKETED

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CalETC's Comments on the Draft Update to the FY 24-25 CTP Investment Plan

Additional submitted attachment is included below.



October 22, 2024

California Energy Commission

Re: Docket No. 24-ALT-01

Submitted electronically to <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=24-ALT-01>

Re: Draft FY 2024-25 Clean Transportation Program Investment Plan Update

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the Draft Update to the Clean Transportation Program Investment Plan (Draft Investment Plan Update). CalETC would like to thank the CEC for all your hard work on developing the Draft Investment Plan Update and for hosting the Advisory Committee Meeting on October 1, 2024.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, and other industry leaders supporting transportation electrification.

CalETC supports the CEC's recommendations contained in the Draft Investment Plan Update. We strongly support the CEC's focus on funding in disadvantaged and low-income communities, and we applaud the fact that 63% of funding through July 2024 was allocated to programs benefiting communities that are disadvantaged, low-income, or both. With regard to the proposed funding allocations for the 2024-2025 fiscal year, we support the allocation of base funds as proposed: \$40 million for light-duty charging infrastructure, \$38.2 million for medium-and-heavy-duty infrastructure, \$15 million for hydrogen refueling, and \$2.0 million for workforce training and development.

CalETC understands that this has been a difficult budget year for the state, and we appreciate this can create uncertainty for the CEC's long-term funding plans and efforts to clearly allocate funding from the Clean Transportation Program funds reauthorized by AB 126 (2023). That said, we are also very concerned about the "start/stop" of some infrastructure incentive programs, including CALeVIP and Communities in Charge. Starting and stopping these programs leads to market uncertainty for both investors and charging station providers at a time when we need to rapidly accelerate construction and energization of new electric vehicle charging stations. CalETC strongly urges the CEC to provide clear, long-term schedules for workshops and solicitations for your signature block grant programs. Without clarity on the timing of future funding opportunities it is

very difficult for charging station providers to plan and scale their investments to meet our shared EV infrastructure goals.

Finally, CalETC urges the CEC to consider funding for Level 1 EV charging in appropriate use cases, such as some apartment buildings and workplaces. Level 1 can be a very convenient charging option for customers when there is sufficient parking to allow the customer to charge for long periods of time. Additionally, Level 1 charging is inexpensive as compared to faster charging. Level 2 chargers cost approximately \$10,000 per charger, whereas Level 1 charger are approximately \$2,500 per charger. For these reasons, we encourage you to consider Level 1 chargers as eligible for funding under Clean Transportation Program Investment Plan.

Thank you for your consideration of our comments. Please do not hesitate to contact me at laura@caletc.com should you have any questions.

Kind regards,

A handwritten signature in black ink, appearing to read 'Laura Renger', with a long horizontal flourish extending to the right.

Laura Renger, Executive Director
California Electric Transportation Coalition